

1           IN THE UNITED STATES DISTRICT COURT  
2                   NORTHERN DISTRICT OF GEORGIA  
3                   ATLANTA DIVISION  
4   SUZANNE GREENE,                   )  
5                                   Plaintiff,                   )   CIVIL ACTION NO.  
6                                   vs.                                   )   1:19-cv-01338-AT  
7   TYLER TECHNOLOGIES, INC., )  
8                                   Defendant.

11           30(B)(6) DEPOSITION OF TYLER TECHNOLOGIES

12                   BY WITNESS: HILLARY PASCH

13                                   October 9, 2019

14                                   10:00 a.m.

15                                   Dentons US, LLP

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20 TYLER TECHNOLOGIES

21

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23

24

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1 MR. HERRINGTON: This is the deposition  
2 by cross-examination of Tyler Technologies, Inc.,  
3 pursuant to Rule 30(b)(6) of the Federal Rules of  
4 Civil Procedure.

5 This deposition is taken for the purpose  
6 of discovery and all other purposes allowed.

7 My name is Matthew Herrington. I'm  
8 counsel for Plaintiff Suzanne Greene.

9 Also present is Paulo McKeeby who is  
10 counsel of record for the Defendant. As well as  
11 Ms. Abby Diaz who is general counsel for the  
12 Defendant.

13 Ms. Moran, would you please swear the  
14 witness.

15 HILLARY PASCH,  
16 being first duly sworn, was examined as follows:

17 THE WITNESS: Yes.

18 EXAMINATION

19 BY MR. HERRINGTON:

20 Q Would you please state your full legal  
21 name.

22 A Sure. Hillary, last name Pasch,  
23 P-A-S-C-H.

24 Q Okay. And would you please spell that  
25 for the court reporter?



1 A H-I-L-L-A-R-Y, last name P-A-S-C-H.

2 Q And it's my understanding you've been  
3 designated to testify today on behalf of Tyler  
4 Technologies; is that correct?

5 A Yes.

6 (Deposition Exhibit 1 marked.)

7 BY MR. HERRINGTON:

8 Q I'm going to hand you a document that's  
9 been marked as Plaintiff's Exhibit 1.

10 Have you seen this document before?

11 A Yes.

12 Q And it's my understanding that you've  
13 been designated to speak about a number of topics  
14 listed in the attachment to this notice of  
15 deposition; is that correct?

16 A Yes.

17 Q Okay. And those topics are No. 1 through  
18 10, No. 12 and No. 16 through 25 with limitations  
19 that have been set by the court.

20 MR. McKEEBY: I will so stipulate.

21 MR. HERRINGTON: Okay.

22 MR. McKEEBY: Will you do me a favor and  
23 just read them again so that I can confirm?

24 MR. HERRINGTON: 1 through 10, 12, and 16  
25 through 25.

1 MR. McKEEBY: Subject to the limitations  
2 from our hearing yesterday, that is correct.

3 BY MR. HERRINGTON:

4 Q Ms. Pasch, will you tell me, have you  
5 ever been deposed before?

6 A No.

7 Q Have you ever attended a deposition?

8 A No.

9 Q Have you ever given testimony in court?

10 A No.

11 Q Okay. Would you please speak up.

12 A Sure.

13 Q Okay. Just to make sure that the court  
14 reporter can hear everything that you're saying.

15 So you understand you're under oath and  
16 that the court reporter is making a testimony of  
17 your -- a record of your testimony?

18 A I do.

19 Q Okay. And you understand that it will be  
20 used as evidence in court?

21 A Yes.

22 Q Okay. All right, if at any time you  
23 don't understand one of my questions, please say so  
24 and I'll repeat or rephrase the question.

25 Please remember that your answers must be

1 verbal because the court reporter cannot take down  
2 a nod of the head, a shrug of the shoulders.

3 We also want to avoid saying uh-huh or  
4 uh-uh because it's difficult for the court reporter  
5 to accurately transcribe that so the court will  
6 understand.

7 If you don't know the answer to a  
8 question, please simply state that you do not know.  
9 And if you need clarification, again, please just  
10 tell me that.

11 Please wait until I finish asking the  
12 question before you answer even if you know for  
13 sure what I'm going to ask, because it's difficult  
14 for the court reporter to accurately take it down  
15 and it makes the transcript of the deposition very  
16 difficult to read if we interrupt each other.

17 Do you have any questions about how the  
18 deposition will proceed?

19 A I do not.

20 Q Okay. And is there any reason that your  
21 ability to testify fully and accurately today would  
22 be impaired?

23 A No.

24 Q All right. I'm going to start by asking  
25 you a few background questions.

1                   Have you ever been known by any other  
2   names other than Hillary Pasch?

3           A     I have not.

4           Q     Would you tell me about your education?

5           A     Absolutely. I graduated from the  
6   Pennsylvania State University and State College of  
7   Pennsylvania with an information science and  
8   technology degree. And two minors in public policy  
9   and organization as well as digital marketing.

10               I have also taken a Shaw Academy class on  
11   digital marketing as well which is just a  
12   certificate that I received from that.

13          Q     Okay. Is that it?

14          A     Yes, sir.

15          Q     Okay. And would you tell me about your  
16   work history after college?

17          A     Absolutely. I started working after  
18   college at AccuWeather. And I worked there less  
19   than a year. And then I got hired on at the State  
20   College Borough in State College, Pennsylvania.

21          Q     What was your position at AccuWeather?

22          A     I was a technical resource.

23          Q     And what does that mean?

24          A     I essentially supported clients and  
25   customers who had issues with weather software that

1 we provided to them.

2 Q Okay. And the next position again was?

3 A I did not mention it yet, but I was an IT  
4 help desk.

5 Q Okay. And where was that?

6 A State College, Pennsylvania, at the  
7 Borough.

8 Q IT help desk.

9 And how long were you there?

10 A I was there, but then I got promoted to  
11 an IT project manager, so all and all between the  
12 two jobs I was there for 10 years.

13 Q Great.

14 And after the State College?

15 A I got hired on in May of 2016 with  
16 ExecuTime as a senior project manager. And then  
17 that was, therefore, acquired by Tyler Technologies  
18 in June of 2016.

19 Q And what are your job duties as a senior  
20 project manager?

21 A I'm not currently a senior project  
22 manager.

23 Q Okay.

24 A I was promoted to manager of  
25 implementation and I was in that job approximately

1 a year.

2 Q Which job were you in at --

3 A The senior project manager job  
4 approximately a year.

5 Q Uh-huh.

6 A The manager of implementation position  
7 for approximately two years. And recently been  
8 promoted to product owner of ExecuTime.

9 Q What does that mean?

10 A I essentially work on development specs.  
11 I own the success of the product. I make sure that  
12 releases for the software are up-to-date, bugs are  
13 fixed. I work with the development team.

14 I also work with other teams, the  
15 implementation teams and support teams, to make  
16 sure that the product is on a road of stability.

17 Q Are you -- as a product owner, are you  
18 associated with a specific Tyler software?

19 A ExecuTime.

20 Q Any other software from Tyler that you  
21 work with?

22 A Not that I work for, no.

23 Q Okay. Do you work with -- would it be  
24 fair to say you work with their other software?

25 A Yes.

1 Q Okay. Do you have any family in Georgia?

2 A I do not.

3 Q Where do you currently live?

4 A Jacksonville, North Carolina.

5 Q And have you ever been convicted of a  
6 crime?

7 A I have not.

8 Q Are you familiar with the Plaintiff in  
9 this case, Suzanne Greene?

10 A Yes.

11 Q You know her personally?

12 A I know her through work.

13 Q And what was your relationship to  
14 Ms. Greene at Tyler?

15 A I was a co-worker and then a manager of  
16 implementation.

17 Q Were you her supervisor as a senior  
18 project manager?

19 A I was not.

20 Q Were you her direct supervisor when you  
21 were manager of implementation?

22 A I was.

23 Q Would you describe the difference between  
24 your position as a senior project manager and  
25 manager of implementation?

1           A     Yes. As a senior project manager, I  
2 managed the projects with the clients. I made sure  
3 that they were on time and on budget. I worked  
4 through timelines. I had several various calls  
5 with them throughout their implementation. And I  
6 met with implementation consultants that were  
7 assigned to those projects as well.

8           Q     All right. Would you tell me what  
9 timelines means?

10          A     Project timelines are the time from when  
11 a project starts with an implementation of  
12 ExecuTime to the time that they go live and are  
13 passed to support.

14          Q     Okay. And you specified that as to  
15 ExecuTime. Would a timeline for any other Tyler  
16 software be the same thing?

17          A     I don't know.

18          Q     Okay. Would you tell me generally what  
19 does Tyler Technologies do?

20          A     They create, evaluate, and provide as  
21 well as implement software to local governments and  
22 municipalities.

23          Q     Okay. What kind of software?

24          A     I deal solely with timekeeping and  
25 advanced scheduling software with ExecuTime.



1     However, Tyler also deals in payroll, enterprise  
2     resource products, public safety products.

3           **Q     Would you tell me what enterprise**  
4     **resource products and public safety products are?**

5           A     Enterprise resource products would be to  
6     my knowledge a gamut of payroll, HR, cashiering.  
7     The goal with that would be to encompass an  
8     all-in-one product for a client.

9           The public safety products would be CAD  
10    systems, radio and dispatch services, anything  
11    public safety, police or fire related.

12          **Q     What was the word that you said earlier,**  
13    **cadda (ph)?**

14          A     CAD. I don't know the acronym and what  
15    it stands for, but it's basically police and fire.

16          **Q     Okay. C-A-D?**

17          A     Yes, sir.

18          **Q     What are the names of some of the other**  
19    **types of software that -- besides ExecuTime that**  
20    **Tyler owns or leases or -- I'm not sure I'm asking**  
21    **the question clearly.**

22                But Tyler owns the rights or the  
23    intellectual property in several different types of  
24    software, correct?

25          A     They do.

1           Q     Okay. Can you name the different types  
2 of software?

3           MR. McKEEBY: And I'm going to object to  
4 this question as outside the scope of the topic  
5 designation. I don't think she's been asked to --

6           MR. HERRINGTON: General business.

7           MR. McKEEBY: Well, that's general and  
8 you're asking her specific questions about the  
9 names of software.

10           I'm not going to tell her not to answer.  
11 I just don't know that she's going to be able to  
12 recite each and every type of Tyler software.

13           She can do the best she can, but I  
14 haven't prepared her as a corporate representative  
15 to answer that question.

16           But you can answer based on what you  
17 know.

18 BY MR. HERRINGTON:

19           Q     Okay. Please tell me what different  
20 types of -- specific types of software -- not types  
21 of software, but names of different types of  
22 software that Tyler owns.

23           A     I'll tell you what I know in a personal  
24 capacity.

25           Q     You're here to testify for the company.

1 MR. McKEEBY: Understood, but she's not  
2 here to testify for the company as to that question  
3 if you didn't put it in place.

4 MR. HERRINGTON: We're not stipulating  
5 that she's not binding the company with her  
6 testimony. I think this is fairly encompassed  
7 within general -- within the very first topic, the  
8 company's general business activities.

9 MR. McKEEBY: I'm not requesting a  
10 stipulation. I'm telling you that she's not  
11 answering on behalf of the company. So we can --  
12 we've got our record. I'm not telling her not to  
13 answer. I'm telling her to answer based on what  
14 she knows. I haven't prepared her with respect to  
15 that question.

16 If you would like me to take a break and  
17 do so, I could perhaps try to do that during --  
18 during a break, but I'm not sure that I can.

19 And I think it's a better course to let  
20 her answer based on her personal knowledge, and if  
21 you have an objection as to how we prepared this  
22 witness, you can take that up.

23 BY MR. HERRINGTON:

24 Q Ms. Pasch, would you tell me what types  
25 of software specifically -- what software products

1     **Tyler owns?**

2                   MR. McKEEBY:   The names?

3                   MR. HERRINGTON:   Yes.

4           A       Tyler Eden, E-D-E-N.   Tyler Munis,  
5   M-U-N-I-S.   Tyler Incod, I-N-C-O-D.   Tyler New  
6   World.

7   BY MR. HERRINGTON:

8           Q       **Any others?**

9           A       That's my knowledge.

10          Q       **Do you know one called IVEE?**

11          A       Infinite Visions.

12          Q       **Is that abbreviated I-V-E-E?**

13          A       It would be.

14          Q       **Can you tell me what Eden is?**

15          A       It is also an ERP system.

16          Q       **What is an ERP system?**

17          A       The enterprise resource planning system.

18          Q       **And --**

19                   MR. McKEEBY:   Same objection as to this  
20   line of questioning.

21                   You can answer, but I haven't prepared  
22   her as a corporate representative to discuss the  
23   specifics of each type of software that Tyler  
24   provides, but you can answer.

25   BY MR. HERRINGTON:

1 Q And what is Munis?

2 A It is also an enterprise resource  
3 planning system.

4 Q Do you know the difference between them?

5 A I do not.

6 Q And Incod?

7 A Also an ERP system.

8 Q And do you know the difference between  
9 Incod and Munis or Incod and Eden?

10 A I do not.

11 Q And New World, can you tell me what that  
12 is?

13 A They have two subsets. They manage  
14 public safety as well as an ERP system. And I do  
15 not know the products beneath each of those.

16 Q And Infinite Visions, can you tell me  
17 what that is?

18 A It is also an ERP system.

19 Q Now, ERPs encompass payroll and  
20 timekeeping?

21 A It would depend upon the ERP system. I  
22 don't know all the products underneath each --  
23 underneath each one of those.

24 Q Does ExecuTime interface with any of  
25 these other products?

1 A Yes.

2 Q Okay. Well, can you tell me how  
3 ExecuTime interfaces differently with these  
4 different products?

5 A They have different datapoints. Each one  
6 of them is designed to interface as a Tyler to  
7 Tyler product.

8 Q Have you ever advised clients on which  
9 ERP to purchase?

10 A I have not.

11 MR. McKEEBY: Are we at a stopping point  
12 where we can talk about these documents?

13 MR. HERRINGTON: Sure.

14 MR. McKEEBY: Just in terms of providing  
15 them to you.

16 Again, let the record reflect that I'm  
17 providing documents, and I've given you two copies  
18 of documents we're producing today in connection  
19 with the deposition.

20 They consist of the contracts that the  
21 court ordered that we produce, five examples, as  
22 well as some additional documents that Ms. Pasch  
23 identified in connection with our preparation for  
24 her appearance as a corporate representative today.

25 And Matt, we will produce Bate stamped

1 copies of those when I get back to the office, but  
2 I wanted to make sure you had a copy of those for  
3 purposes of the deposition.

4 BY MR. HERRINGTON:

5 Q So Ms. Pasch, you were involved in  
6 selecting -- let me back up.

7 The documents that are being produced to  
8 us today include contracts with ExecuTime's  
9 customers; is that correct?

10 A Yes.

11 Q Okay. Can you tell me about how these  
12 were selected?

13 A They were selected as requested, and they  
14 have a -- every single contract Suzi Greene was an  
15 implementation consultant on.

16 Q Okay.

17 MR. McKEEBY: Wait a minute. You  
18 produced five copies, right?

19 THE WITNESS: Yes.

20 MR. McKEEBY: That's not every one that  
21 she worked on.

22 A Each one of them -- right, so I'll  
23 clarify, thank you -- was -- she was involved with.

24 BY MR. HERRINGTON:

25 Q And Ms. Greene was involved in about 300

1 different projects, correct?

2 A I cannot answer that.

3 Q Okay. I'll represent to you the company  
4 has informed us that it was approximately -- and  
5 the court -- that it was approximately 300  
6 different customers.

7 So I'm curious how the five that were  
8 selected were -- what method was used to select  
9 those from all of the contracts?

10 MR. McKEEBY: Object to the form of the  
11 question.

12 You can answer.

13 A They were selected for her involvement.  
14 No other rhyme or reason was used.

15 BY MR. HERRINGTON:

16 Q Okay. So tell me about how -- you know,  
17 physically how these were picked out. I mean, you  
18 -- you searched for Ms. Greene's name in some  
19 location?

20 A As a manager of implementation, I was  
21 aware of which project she was involved with and I  
22 was able to obtain those copies based on that.

23 Q Why did you select these five as opposed  
24 to some others?

25 A They were projects she was involved with



1 within her employment. There was no particular  
2 reason based on any other accounts. There was no  
3 mathematical equation used. I just knew she was  
4 involved with them and that's why I selected them.

5 Q Okay. Were they selected because they  
6 represented different types of contracts that are  
7 representative of different categories of services?

8 A Can you explain what you mean by  
9 "categories"?

10 Q Yeah. Is every -- well, is every  
11 contract that Execu -- every ExecuTime-related  
12 contract with the Tyler customer the same?

13 A No.

14 Q Okay. Can they be divided up into  
15 different types generally?

16 A Yes.

17 Q Okay. Are these contracts that were  
18 selected supposed to be representative of those  
19 different types?

20 A No.

21 Q Okay.

22 MR. HERRINGTON: I understood yesterday  
23 that the court expected that to be the case, that  
24 they would be produced as representative types of  
25 contracts.

1 MR. McKEEBY: It's not my understanding,  
2 but I think you should explore a little bit more in  
3 terms of what the contracts are before you assessed  
4 that.

5 MR. HERRINGTON: Well, we've assessed  
6 they're selected randomly rather than to be  
7 representative.

8 MR. McKEEBY: I don't think that there  
9 was a requirement that they be representative of  
10 anything in particular.

11 They're certainly representative of the  
12 contracts that ExecuTime has with its customers,  
13 whether or not they were selected randomly or not.  
14 BY MR. HERRINGTON:

15 Q What different types of contracts does  
16 ExecuTime -- what different types of ExecuTime  
17 contracts does Tyler use?

18 A We have a daily contract, an hourly  
19 contract, milestone contract, and a paid in full  
20 contract.

21 Q Is that a -- would you say that's a  
22 complete list of the different types, at the most  
23 general level?

24 A That I'm aware of.

25 Q Okay. Would you please explain to me the

1 distinction between daily, hourly, milestone and  
2 paid in full?

3 A I can explain what each one is, not  
4 necessarily the distinction.

5 Q Okay.

6 A Daily is a client is billed in four- or  
7 eight-hour increments. Hourly is billed as  
8 incurred. Milestone is billed when they meet  
9 particular milestones. And paid in full is a paid  
10 upfront contract.

11 Q Would it be fair to say that paid in full  
12 is a flat fee?

13 A Yes.

14 Q Now, when you say "hourly increments" or  
15 "as incurred," as incurred you mean by the hour or  
16 by a certain increment of time?

17 A By a certain increment of time.

18 Q Is there a specific increment that's  
19 used?

20 A 15 minutes.

21 Q Okay. And whose time is that referring  
22 to, you know, those increments?

23 MR. McKEEBY: For the hourly contract?

24 BY MR. HERRINGTON:

25 Q For any of the contracts. If they're

1 different, let me know, but I'm assuming that  
2 hourly and daily time increments are being measured  
3 by the -- you know, the work of the same types of  
4 people.

5 A By the implementation team.

6 Q And what is an implementation team?

7 A It would typically consist of a project  
8 manager and an implementation consultant.

9 Q No other employees?

10 A It would depend upon the contract.

11 Q What other types of employees might be  
12 billed?

13 A It wouldn't be an employee, it would be a  
14 service.

15 Q But services performed by Tyler  
16 Technologies's employees, correct?

17 A Correct.

18 Q Okay. So what other types of employees  
19 might produce a billable time?

20 A It would be an employee performing it,  
21 but they wouldn't bill their time, they would bill  
22 for the service.

23 BY MR. HERRINGTON:

24 Q Okay. And so what types of employees  
25 would that be?

1           A       A deployment team member.

2           Q       **Okay. What's the difference between an**  
3       **implementation team and a deployment team?**

4           A       The deployment team actually installs the  
5       software.

6           Q       **Are there any other types of teams that**  
7       **Tyler uses on projects besides implementation and**  
8       **deployment?**

9                   MR. McKEEBY: Object to the form of the  
10       question as overbroad to the extent that it --  
11       well, I don't think that's -- well, that might be a  
12       fair question.

13                   You can answer.

14           A       If an escalation is needed, a technical  
15       team member would be involved.

16       BY MR. HERRINGTON:

17           Q       **What is an escalation?**

18           A       Typically occurs when a tier support  
19       level or implementation -- implementation team  
20       member needs to escalate the issue for resolution.

21                   MR. HERRINGTON: Would you read me back  
22       her answer?

23                   (Whereupon, the requested portion of  
24       the record was read by the reporter.)

25       BY MR. HERRINGTON:

1 Q I asked what escalation was and the  
2 answer was "when they need to escalate an issue."

3 So can you tell me what is escalation is  
4 without incorporating the word "escalation" into  
5 it?

6 Would it be fair to say that escalation  
7 means there's a problem that needs to be sent to  
8 the technical team to fix?

9 A If a team member needs to reach out for  
10 assistance, yes.

11 (Deposition Exhibit 2 marked.)

12 BY MR. HERRINGTON:

13 Q All right. Would you please take a  
14 moment to look at the document marked Plaintiff's  
15 Exhibit No. 2.

16 Do you recognize this?

17 A It looks familiar.

18 Q Can you tell me what it is supposed to  
19 represent?

20 A A standard implementation plan.

21 Q Does this represent the entire life span  
22 of a Tyler Technologies -- or an ExecuTime customer  
23 project?

24 A Not entire.

25 Q What would you say is missing from the

1 lifetime of the project as it's represented on  
2 Exhibit 2?

3 A I would say this is a broad view and it  
4 does not have the details.

5 Q Okay. But is there anything missing from  
6 the beginning or end? For example, Assess and  
7 Design, is that supposed to encompass the first  
8 step of selecting software that's going to be  
9 purchased by a customer?

10 A The software would have already been  
11 purchased.

12 Q Okay. Prior to assess and design?

13 A Correct.

14 Q Okay. Now, does Tyler sell the software  
15 outright to be used, you know, perpetually or do  
16 they have to lease it for a certain amount of time?

17 MR. McKEEBY: Object to form of the  
18 question.

19 You can answer it.

20 BY MR. HERRINGTON:

21 Q Do you understand what I asked?

22 A Please repeat.

23 Q Do customers purchase Tyler software to  
24 keep and use forever as long as they want to or do  
25 they need to lease your software for a specific

1 amount of time?

2 In other words, are they getting a  
3 license for a certain amount of time or purchasing  
4 for an indefinite use?

5 MR. McKEEBY: And this is specific to  
6 ExecuTime? Because I don't think she's going to  
7 know otherwise, but you can answer based on what  
8 you know.

9 BY MR. HERRINGTON:

10 Q If you only know for ExecuTime, then you  
11 can so stipulate that. For right now I am asking  
12 about all Tyler projects. Just tell me when you  
13 only know about ExecuTime.

14 A I do only know about ExecuTime. And  
15 clients will purchase licensing. And if they would  
16 like maintenance and support, they also pay for  
17 that.

18 Q Okay. Do you ever use Adobe Acrobat?

19 A Yes.

20 Q Okay. Are you familiar with you can  
21 purchase the CD or whatever, download it and it's  
22 yours to keep forever versus their DC plan where  
23 you buy it for one year and then it stops working?

24 A I don't know.

25 Q No?



1 Well, does Tyler -- does ExecuTime work  
2 like that where you get it and your customer can  
3 only use it for a set amount of time before they  
4 would need to relicense it to continue using it?

5 A I don't know.

6 Q Okay. All right. So say the city of  
7 Atlanta calls -- calls Tyler and says, "I need  
8 payroll and HR software. Time and payroll  
9 software." Who's the first person that they're  
10 going to be sent to to speak -- to speak with?  
11 What type of position?

12 A I don't want to speculate because they  
13 could have spoken to a receptionist.

14 Q Uh-huh.

15 A But in order to purchase software, they  
16 would speak to a sales representative.

17 Q Okay. And does the sales rep make  
18 recommendations about what type of software fits  
19 their needs generally?

20 A I believe it would depend upon who was  
21 calling, what their needs were.

22 Q Are the sales reps assigned to a specific  
23 type of software?

24 A Yes.

25 Q So you have ExecuTime sales reps versus a

1     **Munis sales rep?**

2           A     Correct.

3           Q     Well, who decides which sales rep they go  
4     to before they decided what software they're going  
5     to purchase?

6           A     I'm not familiar with the designation of  
7     sales representatives. I believe it would depend  
8     upon if they submitted for -- a request for  
9     proposal.

10          Q     Uh-huh. Have you seen a request for  
11     proposal before?

12          A     Yes.

13          Q     So is it a sales rep who would make the  
14     recommendation about which Tyler product is most  
15     appropriate?

16          A     I believe it would be a collaboration.

17          Q     Between who?

18          A     Sales representatives, product owners.

19          Q     Do customers ever come to you first  
20     before they've spoken to a sales rep as a product  
21     owner?

22          A     Not typically.

23                     MR. HERRINGTON: Just one moment.

24                     (Off the record.)

25                     MR. HERRINGTON: Let's go back on the

1 record.

2 BY MR. HERRINGTON:

3 Q Okay. So they talk to the sales rep -- a  
4 new customer talks to the sales rep and maybe with  
5 the product owner to make a decision about what  
6 Tyler product to buy.

7 Who do they get sent to after that, after  
8 the decision has been made?

9 A Can you clarify what decision, please?

10 Q Which Tyler product to purchase.

11 They've decided "I want ExecuTime  
12 software." Okay, done deal. Who makes the  
13 contract? You know, who is the person in charge of  
14 the contracting?

15 A I believe sales representatives create  
16 the contract, but it must also go through legal.

17 Q Now, when I'm -- and, again, I'm -- when  
18 I say purchase ExecuTime software, we haven't  
19 really established whether it's a term lease of the  
20 software or if it's an outright purchase of the  
21 software for indefinite use, so I'm going to say  
22 purchase, but I'm not expecting -- I'm not saying  
23 that to try to lock down the company as to, you  
24 know, it's a definite purchase versus lease, it's  
25 just, you know.

1 MR. McKEEBY: They're purchasing  
2 something clearly.

3 BY MR. HERRINGTON:

4 Q Yeah, they're purchasing something and  
5 we're just going to say they're purchasing the  
6 software for the sake of simplicity, but not  
7 necessarily because that's totally accurate. It  
8 may not be.

9 So after they've done their contract and  
10 purchased ExecuTime, they have made a choice  
11 between daily, hourly, milestone, or paid in full  
12 contract, correct?

13 A Correct.

14 Q Okay. Are you aware of any other major  
15 distinctions between those types of contracts other  
16 than the way that it's billed?

17 A It would depend upon the contract and  
18 what was decided within it.

19 Q Is there something within ExecuTime  
20 called -- that would be fair to call a module?

21 A Yes.

22 Q Okay. Would you describe what a module  
23 is?

24 A A module in the sense of ExecuTime is one  
25 of two. Either it is time and attendance or it is

1 advanced scheduling. And the module basically  
2 would be what capabilities do you have within the  
3 software.

4 Q All right. And so what are the -- what  
5 are the differences of capabilities between time  
6 and attendance versus advanced scheduling?

7 A The advanced scheduling module has more  
8 robust scheduling capabilities.

9 Q Uh-huh.

10 A It allows for wheel offerings.

11 Q I'm sorry?

12 A Wheel offerings.

13 Q W-H-E-E-L?

14 A Correct.

15 Q Okay. Go on.

16 A There is a trade board.

17 Q Uh-huh.

18 A That's -- that's my knowledge of that.

19 Q Okay. And would you explain to me what  
20 both of those mean?

21 A Wheel offering is when you can take a  
22 shift and offer it up on to the wheel which allows  
23 other employees to sign up for the shift.

24 Trade board allows employees to trade  
25 shifts with each other.

1           Q     So it sounds like both of those involve  
2     an employee taking a shift from someone else. But  
3     is the distinction that with trade board you must  
4     give up a shift to get a shift, whereas, with wheel  
5     offerings you don't?

6           A     Not necessarily.

7           Q     Okay. Then can you help me understand  
8     better the difference because it sounds like both  
9     involve taking a shift from somebody else?

10           MR. McKEEBY: The difference between  
11     wheel offerings and trade board?

12           MR. HERRINGTON: Uh-huh.

13           A     Typically wheel offerings would be a  
14     supervisor putting a shift up.

15     BY MR. HERRINGTON:

16           Q     Uh-huh. Okay.

17           A     Someone calls in sick, they need to fill  
18     the shift. The trade board is when an employee  
19     typically activates the trade.

20           Q     Thank you.

21                     Okay. Now, who decides whether to choose  
22     advanced scheduling or time and attendance for a  
23     given customer?

24           A     Time and attendance is a prerequisite.

25     Adding --

1 Q That's the basic level?

2 A Correct.

3 Q Well, who decides whether to get the  
4 advanced -- the advanced scheduling module?

5 A The client.

6 Q Okay. Who do they consult to make that  
7 decision?

8 A The sales rep.

9 Q Okay. And I assume that advanced  
10 scheduling is more expensive; is that correct?

11 A It adds an additional cost to purchase an  
12 additional module.

13 Q Okay. And you can't have advanced  
14 scheduling without time and attendance?

15 A Correct.

16 Q What kinds of analysis does the sales rep  
17 do to determine their recommendations for which --  
18 whether the second module is appropriate? And by  
19 second module I mean advanced scheduling.

20 A I don't know the steps that they take.

21 Q All right. Well, after they have  
22 purchased time and attendance software or -- let's  
23 just call them the first and second modules, can we  
24 do that?

25 A Yes.

1 MR. McKEEBY: The first being the basic  
2 level and time and attendance?

3 MR. HERRINGTON: Time and attendance.

4 MR. McKEEBY: Okay.

5 BY MR. HERRINGTON:

6 Q Okay. So they've decided to get one or  
7 both modules. What's the next step in the lifetime  
8 of the project?

9 A If a contract has been signed, the sales  
10 rep sends it to a team at ExecuTime.

11 Q Which team?

12 A It typically includes the manager of  
13 implementation.

14 Q Is that a project manager?

15 A No.

16 Q Okay.

17 A And the director of ExecuTime.

18 Q Uh-huh.

19 A And the manager of implementation and  
20 support.

21 Q So the manager of implementation is  
22 different from the manager of implementation and  
23 support?

24 A Correct.

25 Q Can you describe to me generally the



1 different responsibilities of those three  
2 positions?

3 A I can give a broad view. The director is  
4 in charge of all business relations of ExecuTime.

5 Q Uh-huh.

6 A The manager of implementation and support  
7 is a manager over manager of implementation as well  
8 as the remainder of the implementation teams,  
9 including project managers and implementation  
10 consultants.

11 The manager of implementation is the  
12 manager of the project managers and implementation  
13 consultants.

14 Q Okay. Does the manager of implementation  
15 and support manage -- is there a manager of support  
16 somewhere?

17 A Yes.

18 Q Okay. So the manager of implementation  
19 and support is managing two teams? Or down the  
20 hierarchy from the manager of implementation and  
21 support you would find two different teams; is that  
22 correct?

23 A Correct.

24 Q Okay. All right. Well, we've said that  
25 after the contract is signed it's sent to the three

1 of them, the project. What do the three of them do  
2 with the project before passing it on to the next  
3 step?

4 A They read the contract.

5 Q Uh-huh.

6 A Determine what modules have been  
7 purchased.

8 Q Uh-huh.

9 A And then assign resources accordingly.

10 Q Okay. What are resources?

11 A Project manager and implementation  
12 consultant teams.

13 Q Now, on each project -- are there  
14 multiple implementation consultants on a single  
15 project?

16 A Not typically.

17 Q Okay. Does the project manager choose  
18 the implementation consultant or is it decided --  
19 is the implementation consultant chosen at a higher  
20 level than the project manager?

21 A An implementation consultant is assigned  
22 typically to a project manager.

23 Q Okay. So does an implementation  
24 consultant always -- or typically work with the  
25 same project manager on all projects?

1 A Yes.

2 Q Okay. Now, the project manager is going  
3 to manage multiple implementation consultants,  
4 correct?

5 A It depends. There are some teams that  
6 have that and some that do not.

7 Q Okay. So sometimes a project manager  
8 works on every project with the same implementation  
9 consultant?

10 A That is typical.

11 Q Okay. So the manager of implementation,  
12 director of ExecuTime, and the manager of  
13 implementation and support have assigned a project  
14 to an implementation team consisting of a project  
15 manager and an implementation consultant.

16 What is the first step that the project  
17 manager would take?

18 A Reading the contract.

19 Q Okay. And based upon a reading of the  
20 contract, what kind of decisions have to be made?

21 A Where they would be installed for their  
22 software.

23 Q Do you mean physically, like, where is  
24 their hardware located?

25 A Correct.

1 Q Okay.

2 A If time clocks were on the contract and  
3 they needed to be purchased.

4 Q You're talking about purchasing hardware  
5 for time clocks?

6 A Correct.

7 Q Like physical time clocks?

8 A Yes.

9 Q So contracts can include time clocks or  
10 not?

11 A Correct.

12 Q Okay. And that's -- and that decision is  
13 made in conjunction with the sales rep early on?

14 A Yes.

15 Q Okay. Are there any other features like  
16 that? We've established that they choose one or  
17 two modules, now time clocks. Are there any other  
18 typical purchase decisions that have to be made?

19 A Whether or not they purchased a mobile  
20 module.

21 Q Is that like a mobile app?

22 A It is not an app.

23 Q I've seen -- Suzi was, you know, very  
24 specific about that, too. Is that a point of  
25 contention for some reason that -- are you

1     **developing an app? I mean --**

2                   MR. HERRINGTON: Let's go off the record.

3                   (Off the record.)

4                   MR. HERRINGTON: Let's go back on the  
5     record.

6     BY MR. HERRINGTON:

7           Q     **So would the mobile -- the mobile module**  
8     **you would access that through just a general web**  
9     **browser on your own?**

10          A     Correct.

11          Q     **Okay. Is it set up so that you -- so**  
12     **that you view differently when you're on a phone**  
13     **versus if you're on a desktop?**

14          A     Yes.

15          Q     **Okay. So you could go to the same portal**  
16     **or website and it won't look the same on your phone**  
17     **versus your desktop computer?**

18          A     You would need to select mobile or  
19     desktop.

20          Q     **I see.**

21                   **And so are the same features available on**  
22     **both?**

23          A     No.

24          Q     **Okay. So you can't do everything on the**  
25     **mobile app -- or sorry, you can't do everything on**

1 the mobile module that you can do on the desktop  
2 module?

3 A That's correct.

4 Q Okay. Is that -- am I accurately using  
5 the terms "desktop module" and "mobile module"?

6 A Yes.

7 Q Okay. Anything else that they would  
8 decide to purchase at the time the contract is  
9 being created other than time clocks and mobile  
10 module?

11 A No.

12 Q Does the number of employees make a  
13 difference to the cost of a project to a customer?

14 MR. McKEEBY: The number of employees at  
15 the customer?

16 BY MR. HERRINGTON:

17 Q Yeah, the number of employees who --  
18 yeah, who are going to be using the software, does  
19 that make a difference as to how much the customer  
20 ends up having to pay for the project?

21 A It does with licensing.

22 Q Okay. Now, with the time and attendance  
23 software, rather than advanced schedule, with time  
24 and attendance do employees have access to that or  
25 is it -- does the -- not just employees, but do --

1 is it typical that a -- that's only going to be  
2 used by HR personnel or management rather than  
3 lower level employees?

4 A Are you speaking specifically about time  
5 and attendance?

6 Q Yes.

7 A No.

8 Q Okay. So employees would use it to track  
9 their own time and attendance?

10 A Possibly.

11 Q Okay. Not every company wants that,  
12 though?

13 A Correct.

14 MR. McKEEBY: By "company" you --

15 BY MR. HERRINGTON:

16 Q I'm sorry. By company, I mean, customer,  
17 yes. And, of course, we're dealing with public  
18 sector, so company is probably not even the correct  
19 word.

20 ExecuTime is only for public sector  
21 employers, correct?

22 A Correct.

23 Q Okay. Are all of Tyler Technologies'  
24 software offerings for public employers only? By  
25 that I mean public sector.

1 A Yes.

2 MR. McKEEBY: Can we take a break when  
3 you come to a stopping point?

4 MR. HERRINGTON: Right now is fine.

5 (Recess taken.)

6 BY MR. HERRINGTON:

7 Q So you were hired by ExecuTime?

8 A Correct.

9 Q The company ExecuTime as opposed to just  
10 the software?

11 A Correct.

12 Q Okay. And then Tyler purchased  
13 ExecuTime?

14 A They acquired them.

15 Q They acquired them. It was a stock  
16 purchase?

17 A I don't know about the stock purchase.

18 Q Okay. Did they keep all of the  
19 employees?

20 A To my knowledge.

21 Q Okay. So substantially all?

22 A Correct.

23 Q Okay. Did they change people's  
24 positions, Tyler, when they -- after the purchase  
25 or after the acquisition rather? Did everyone stay



1 in the same positions they had been in previously?

2 A Some job titles did change.

3 Q Okay. Have any major changes -- and  
4 major, I'll let you evaluate what constitutes  
5 major. Any major changes to ExecuTime software  
6 since the acquisition?

7 A Many improvements have been added as part  
8 of our roadmap.

9 Q So it's a continuous process of upgrading  
10 or improving the software?

11 A Yes.

12 Q Okay. Does it generally do the same  
13 thing that it did prior to the acquisition?

14 A Yes.

15 Q Okay. When a customer has purchased  
16 ongoing support for the software, how long does  
17 that last typically?

18 A It depends on the contract terms.

19 Q Does Tyler have customers who require  
20 support indefinitely and simply get billed as it  
21 occurs?

22 A I think contracts would need renewed.

23 Q Okay. Does Tyler service -- or has Tyler  
24 entered into contracts for continued support with  
25 customers who originally purchased the software

1 from ExecuTime rather than Tyler?

2 A Yes, we have Legacy clients.

3 Q Legacy clients, okay, thank you.

4 So was there generally continuity between  
5 -- at the time of the acquisition, was there  
6 continuity in the customers who were being  
7 serviced?

8 A Can you elaborate on continuity for me,  
9 please?

10 Q Did Tyler take over servicing contracts  
11 that were already -- projects that were already  
12 underway?

13 A Yes.

14 Q Okay. All right. Did Tyler retain  
15 ExecuTime's personnel files for their employees?

16 A I believe so.

17 (Deposition Exhibit 3 marked.)

18 BY MR. HERRINGTON:

19 Q I hand you a document that's been marked  
20 as Plaintiff's Exhibit No. 3. And I'll represent  
21 to you that this was provided to us by Tyler.

22 And you'd agree this appears to be the  
23 offer of employment and acceptance for Ms. Greene's  
24 employment by ExecuTime?

25 A It appears so.

1 Q Okay. So we can agree that Tyler did at  
2 the very least possess Ms. Greene's paperwork from  
3 the beginning of her employment with ExecuTime?

4 A With relation to this document, yes.

5 Q Okay. Are there any employee benefit  
6 plans at Tyler?

7 A Yes.

8 Q Okay. Did those exist -- were they --  
9 were any of the employee benefit plans taken over  
10 that were already in place under ExecuTime?

11 A I don't recall.

12 Q You were hired in May of '16?

13 A Correct.

14 Q Okay. Did you have a probationary period  
15 or a trial period?

16 A What do you mean by "probationary"?

17 Q Well, different companies would define it  
18 differently probably. Did you have anything that  
19 was in your -- in your -- in the terms of your  
20 employment, did they label the first 30 or 90 days  
21 or a period of time as being probationary or a  
22 trial?

23 A I don't recall the exact terminology, but  
24 we do an onboarding process.

25 Q Okay.

1           A     I do recall I was part of an onboarding  
2     process.

3           Q     How long did it last?

4           A     90 days.

5           Q     So did the onboarding continue after  
6     ExecuTime was purchased -- was acquired by Tyler in  
7     June?

8           A     Yes.

9           Q     Okay. I think that I beat that horse  
10    enough.

11                   MR. McKEEBY: I won't disagree. I don't  
12    think it's an issue, though.

13    BY MR. HERRINGTON:

14           Q     How many implementation consultants does  
15    ExecuTime employ?

16           A     Currently?

17           Q     Uh-huh.

18           A     Including both modules?

19           Q     Yes.

20           A     Approximately eight.

21           Q     Okay. Now, what about Tyler all  
22    together, how many implementation consultants?

23           A     That, I don't know.

24           Q     Okay. Can you say if it's less than a  
25    hundred?

1 MR. McKEEBY: And I'm going to object to  
2 the question as outside the scope of the topic  
3 designations.

4 You can answer it based on what you know.

5 A I would say no.

6 BY MR. HERRINGTON:

7 Q It's not less than a hundred. Do you  
8 know if it's less than 200?

9 A I don't know.

10 Q So you think it's likely more than a  
11 hundred but less than 200?

12 MR. McKEEBY: Object to the form of the  
13 question and object as outside the scope of the  
14 topic designation.

15 You may answer based on what you know.

16 A That would be my guess.

17 BY MR. HERRINGTON:

18 Q Okay. Can you tell me -- with ExecuTime  
19 implementation consultants you said there's  
20 approximately eight currently employed?

21 A Correct.

22 Q Was that number the same back in 2016?

23 A No.

24 Q Okay. How many were employed then?

25 A Before acquisition?

1 Q Sure.

2 A Having just started, I'm not sure.

3 Q Okay. What about after the acquisition?

4 A Referring to the retainage of the  
5 employees, I would say it was the same through the  
6 acquisition.

7 Q Okay. So approximately eight have been  
8 employed at any given time since 2016?

9 A Approximately.

10 Q Okay. And how much turnover has there  
11 been in the implementation consultants who were  
12 employed?

13 A Strictly with ExecuTime?

14 Q Sure.

15 A Are you looking for a percentage?

16 Q How many -- yeah, can you tell me in a  
17 year how much turnover you would say is normal?

18 MR. McKEEBY: At the implementation  
19 consultant level?

20 MR. HERRINGTON: Uh-huh. Yes.

21 A I don't know the exact attrition, but I  
22 would say approximately -- and are you referring  
23 to, just as a correction, people leaving or people  
24 coming for attrition?

25 BY MR. HERRINGTON:

1 Q Well, because the number has been  
2 approximately the same, I expect that the number  
3 leaving and coming is approximately identical; is  
4 that correct?

5 A We had expanded so there would be a  
6 fluctuation in incoming.

7 Q By "expanded," you mean that they've  
8 hired more --

9 A Correct.

10 Q -- implementation consultants?

11 A Correct.

12 Q Well, how is it possible then that there  
13 were approximately the same number in '16 and '19?

14 A There was approximately the same number  
15 from acquisition to before acquisition. From 2016  
16 to 2019, it has grown.

17 Q Okay. Can you tell me how many  
18 implementation consultants were employed post  
19 acquisition before it grew?

20 A I don't have an exact number, but I would  
21 say three or four.

22 Q Okay. Can customers of ExecuTime -- or  
23 of Tyler when they purchase the license, when they  
24 license ExecuTime software, can they make that  
25 purchase independent of -- without purchasing any

1     **servicing by ExecuTime employees?**

2           A     Can you describe "servicing"?

3           Q     **Yeah.**

4                   Can they purchase the software without  
5     the installation, the implementation, and the  
6     support?

7           A     That's not recommended.

8           Q     **Okay. Has it been done?**

9           A     Not to my knowledge.

10          Q     **Okay. Are there different levels of**  
11     **service that customers can purchase? For example,**  
12     **can they purchase only the installation?**

13          A     Not to my knowledge.

14          Q     **So are you aware of any customers who**  
15     **purchased ExecuTime who have not gotten the**  
16     **installation, the implementation, and the**  
17     **post-implementation support?**

18          A     Not to my knowledge, no.

19          Q     **So really the --**

20                   MR. HERRINGTON: Let's actually go off  
21     the record for a second.

22                   (Off the record.)

23                   MR. HERRINGTON: Back on the record.

24     BY MR. HERRINGTON:

25          Q     **Do customers purchase different -- and I**



1 realize that -- I want to preface this by saying I  
2 realize that some customers are getting billed  
3 simply ala carte for each service, hour or day that  
4 they're -- that they're actually using.

5 But do -- with that said, do customers  
6 enter into contracts for -- in anticipation of  
7 different -- different terms of support?

8 You know, would -- the original contract  
9 anticipating three months of support versus a year?

10 A It's likely there will be at least a year  
11 of annual maintenance.

12 Q So for the daily contracts, I've heard  
13 the word "a pool of days" used. Have you heard  
14 this term?

15 A A pool of days used?

16 Q Uh-huh. Yeah, when they're purchasing --  
17 when they're entering into a contract with Tyler,  
18 that they would purchase a set amount of days of  
19 service?

20 A Yes.

21 Q Okay. And so is that referred to as a  
22 pool of days?

23 A It could be.

24 Q Okay. Now, in a contract -- if they're  
25 choosing a milestone contract, what are the

1 different milestones that would be used to  
2 determine -- you know, what different types of  
3 milestone contracts might a customer purchase?

4 A It would depend upon the contract terms  
5 decided with the sales representative.

6 Q Uh-huh.

7 A Typical ones would be based on  
8 percentages.

9 Q Percentage?

10 A Percentage of the contract billed when a  
11 milestone is met. And an example of a milestone  
12 would be when they -- the client went into  
13 production.

14 Q What does that mean "went into  
15 production"?

16 A Going live with the software. They've  
17 officially -- in ExecuTime terms. It's potentially  
18 different than other entities within Tyler. Going  
19 live means the first day of their live pay period.

20 Q Okay. Does Tyler use the term "elbow  
21 support"?

22 A I'm not familiar.

23 Q Okay. So go live would not encompass  
24 beyond the first day of the software being used by  
25 the customer? Or does it encompass a specific

1 amount of time, the term "go live"?

2 A The actual day of go live is the day.  
3 The phase of go live is a determined amount of  
4 time.

5 Q Okay. So there's an event that's go live  
6 and then there's a phase that's also called go  
7 live?

8 A Correct.

9 Q Okay. Does that phase differ in length  
10 depending on the customer?

11 A It does.

12 Q And can you give me a range of how long  
13 that phase might last?

14 A It depends on a client's pay periods.  
15 Some are weekly, some are biweekly, some are  
16 semi-monthly, some are monthly.

17 Q So those are the increments they're being  
18 billed in?

19 A Those are the increments of their pay  
20 period for their employee.

21 Q I see. I see.

22 So it would be the first pay period?

23 A Correct.

24 Q Okay. So the go live would simply be the  
25 first pay period, the first full cycle of payroll?

1 A In addition to payroll processing, yes.

2 Q Okay. Let's go back to Exhibit No. 2.

3 They purchased the software with the  
4 sales rep. It's gone through legal, gotten  
5 approved, and it's been sent off to the manager of  
6 implementation, director of ExecuTime and the  
7 manager of implementation support.

8 And from there, the project has been  
9 assigned to a project manager and implementation  
10 consultant.

11 After it -- I'm sorry, the modules were  
12 chosen back with the sales rep, right?

13 A Typically.

14 Q So what is the first thing the project  
15 manager is going to do?

16 A I believe I previously referenced  
17 reviewing the contract.

18 Q Okay. And after that?

19 A Then they would do a number of different  
20 things to get the project moving. Sending a  
21 welcome packet will be their first correspondence  
22 with the client likely.

23 Q Okay. Now, when they're reviewing the  
24 contract, what are they reviewing it for?

25 A Terms. If it's daily or hourly, et

1 cetera, what hardware they have, where they'll be  
2 installed. Terms to pay attention to. If there  
3 was any funded development as well.

4 Q Funded development?

5 A Correct.

6 Q What is that?

7 A If a client would like to add something  
8 to the software that is not in existence when they  
9 purchased it.

10 Q Can you give me an example of that?

11 A It does -- this is an example. I'm not  
12 saying it does or doesn't do this. It's just an  
13 example.

14 It doesn't allow me to have an attendance  
15 check it. As a client, I would like that. I will  
16 fund that.

17 Q That's not determined at the level of --  
18 the contracting level at the beginning?

19 A Yes.

20 Q It is?

21 A PM is looking whether or not there is  
22 anything like that included in the contract.

23 Q Okay. So that would not be part of --  
24 these would be things that are not part of  
25 ExecuTime normally?

1 A Correct.

2 Q So does someone, you know, recode  
3 ExecuTime to do things that it normally doesn't do?

4 A No, it's an added functionality.

5 Q Is it a different module?

6 A No.

7 Q Is there an additional cost for  
8 additional functionalities?

9 A If they would like to fund it, yes.

10 Q Is there a list of functionalities that  
11 they have to choose from or is it completely custom  
12 for each customer?

13 A There's a template of the system and  
14 allowed capabilities within the software are based  
15 upon client and how they need to use it. That's  
16 the core of ExecuTime.

17 Q So the project manager's reviewed the  
18 terms for the hardware, the location of the  
19 installed, the functionalities. They've sent the  
20 welcome packet making contact with the customer.  
21 What is the project manager's next step?

22 A They have a series of tasks that are  
23 typically assigned to them requesting the install  
24 or deployment of the software.

25 Q And what does that mean?

1           A       Scheduling a date with the deployment  
2       team.

3           Q       What is the deployment team?

4           A       A team that installs the ExecuTime  
5       software.

6           Q       Do they carry it around on a disk and  
7       insert it into the customer's computer physically  
8       or is it downloaded?

9           A       Typically, it's deployed using a tool  
10       called Tyler Deploy. So it's a standard install  
11       for all clients.

12          Q       But is that done -- is the software  
13       downloaded off -- for lack of a better word -- the  
14       internet or is it physically brought in in some  
15       sort of a flash drive, an external hard drive or a  
16       CD and plugged in?

17          A       For ExecuTime, installs are typically  
18       done remotely, not using hardware that you  
19       mentioned or peripherals that you mentioned.

20          Q       Okay. So you just get on to the computer  
21       at the customer's location where they're going to  
22       be hosting it and you access it remotely from  
23       ExecuTime and download it essentially.

24          A       Not unless they're hosted by Tyler, which  
25       there are contracts that are Tyler SaaS.

1           Q     Okay. So in that case you're -- what is  
2     an install like when it's hosted by Tyler? They're  
3     just logging into a portal?

4           A     I've not completed an install myself so I  
5     don't know the actual steps. There's typically a  
6     secured data center in which a Tyler SaaS client is  
7     installed on.

8           Q     From the customer's point of view, the  
9     only thing they're doing is going on their computer  
10    and opening an internet browser?

11          A     Correct.

12          Q     Okay. So there's nothing actually  
13    installed on their computers?

14          A     No.

15          Q     Okay. How do they make the decision  
16    about that, about whether to access it remotely or  
17    to have it installed on their physical devices?

18          A     Typically decided within the contract.  
19    However, there have been some cases where the  
20    client will speak with the implementation team, get  
21    their expertise and switch their contract.

22                So they came to us with a contract of  
23    self-hosted and then they switched to a SaaS  
24    contract based on maybe some judgment given by the  
25    implementation consultant or project manager.



1 Q Okay. How often has that happened during  
2 your employment?

3 A Those particular cases, several times.

4 Q More than 10?

5 A I'd say approximately that.

6 Q Okay. And over how many years?

7 A Three and a half.

8 Q Okay. And are you aware of any projects  
9 in which Ms. Greene made recommendations to switch  
10 from self-hosted to remote?

11 A I do not have a specific client example.

12 Q So going back to Exhibit 2, Assess and  
13 Design, the first arrow I see there, what team is  
14 that referring to? Who does the assessing and  
15 designing?

16 A The implementation team.

17 Q Okay. And this is reading the contract,  
18 examining what hardwares to be used, location of  
19 the install and the functionalities?

20 A It could also include working with the  
21 client on their questionnaire, building a statement  
22 of work or solution design.

23 Q Anything else?

24 A Creation of an initial project timeline.

25 Q All right. What is a questionnaire?

1           A       It's a document we provide to the clients  
2       so that we can ask questions related to how their  
3       system will need to be set up.

4           Q       **Is the same questionnaire used for all**  
5       **clients?**

6           A       Typically, yes.

7           Q       **Okay. What is a statement of work?**

8           A       That is developed from the questionnaire.  
9       It is typically an agreement between the client and  
10      the implementation team on roles and  
11      responsibilities, how policies will be set up.

12          Q       **Are you talking about the customer's**  
13      **rules and responsibilities for their own employees?**

14          A       For people involved in the  
15      implementation.

16          Q       **Okay. So who's going to do this, who's**  
17      **going to do that during the implementation?**

18          A       Correct.

19          Q       **Okay. What did you mean by "solution**  
20      **design"?**

21          A       Another term for statement of work.

22          Q       **Okay. So this is essentially assignment**  
23      **of tasks?**

24          A       And a setup of templated for how the  
25      application will be set up, pay codes that will be

1 used, et cetera.

2 Q When you said setting up templates, are  
3 there different categories of templates?

4 A Can you describe what you mean by  
5 categories in relation to templates?

6 Q No, you said you're setting up templates  
7 and there's obviously different types of templates.  
8 So I'm looking for, to start with at least, the  
9 most general distinctions between types.

10 A There's no categorization for templates.  
11 The template is a responsibility to be set up by  
12 the implementation consultant on taking those  
13 documents, taking the information they were  
14 provided and worked with with the client and their  
15 project manager and setting up the system in  
16 preparation for training.

17 Q Okay. So the customer has purchased  
18 certain features, and the plan, the statement of  
19 work has to reflect those features; is that fair to  
20 say?

21 A The statement of work would need to  
22 include a high level overview of how the system  
23 should be set up.

24 Q And then the templates -- what I'm trying  
25 to get at is, the choice between various templates

1 or various functionalities that are chosen from in  
2 these templates. Where is the decision made? You  
3 know, is that something that's in the contract  
4 itself or is that something that the customer's not  
5 even involved in choosing?

6 A The decision is made between -- a  
7 collaboration between the project manager and the  
8 implementation consultant and the client.

9 Q Okay. So both the project manager and  
10 the implementation consultant together?

11 A They collaborate on this, yes.

12 Q Okay. The project manager supervises the  
13 implementation consultant?

14 A Currently, yes.

15 Q Okay. Now, what is the creation of an  
16 initial project timeline?

17 A Those are tasks and hopeful dates  
18 assigned so that we can map the project timeline to  
19 a go live.

20 Q Okay. Now, are there standard time  
21 frames that specific tasks are supposed to be  
22 accomplished within?

23 A It depends on the client again whether or  
24 not they're electing for a training to be done  
25 on-site, remotely. Whether or not they requested

1 certain ones be done remotely and certain ones to  
2 be done on-site. Whether that was a collaboration  
3 and they had decided, hey, I'd like these on-site  
4 and then later on with expertise from the  
5 implementation consultant, they decided to do them  
6 remotely or vice versa.

7 **Q The choice to do remote training versus**  
8 **in-person, is that made in the initial contract?**

9 A It can be. But it is typical that that  
10 is a recommendation from the project team, most  
11 specifically the implementation consultant based on  
12 interactions with the client. How they feel they  
13 would receive and be receptive of the training  
14 material.

15 **Q Okay. What is the project manager's role**  
16 **in choosing between remote and in-person training?**

17 A They can also make a recommendation, but  
18 it's typical that is decided by the implementation  
19 consultant and the client.

20 **Q What kind of factors are used to evaluate**  
21 **whether a customer should get remote versus**  
22 **in-person training?**

23 A How many hours are included in their  
24 contract, how many employees and different groups  
25 need to be trained, interworkings with the client,

1 and getting that feel.

2 Not having a technical term for that, but  
3 working in the business and knowing they're going  
4 to be more receptive and they're going to be  
5 happier at the end if I'm there with them holding  
6 their hand.

7 **Q All right. Are you aware of any specific**  
8 **examples of Ms. Greene making such recommendations?**

9 A This would have been a daily thing that  
10 would be responsible of an implementation  
11 consultant. That is definitely an expectation to  
12 say with my resource planning and my schedule, I  
13 will need to determine that with each and every  
14 client that I work with.

15 **Q Are you aware of any documents that**  
16 **actually reflect her doing that, saying, I**  
17 **recommend that you do this based on this and this**  
18 **and this?**

19 A I'm aware that typically those  
20 conversations happen via a telephone call. We  
21 require a scheduling call with the client and they  
22 review when they're going to travel, if they're  
23 traveling, if they're on-site. And those types of  
24 things are discussed on that scheduling call with  
25 the client.

1           **Q     Who's on a scheduling call?**

2           A     Typically the client's project manager  
3     and implementation team, the implementation  
4     consultant and the project manager.

5           **Q     So, again, back to my question: Are you**  
6     **aware of any documents that would actually reflect**  
7     **Ms. Greene making such recommendations?**

8           A     I don't have an exact example.

9           **Q     So the timeline is created, and then what**  
10    **happens?**

11          A     A client must agree upon that timeline.

12          **Q     So the customer makes the final call?**

13          A     They agree with what was proposed to them  
14    for the timeline. Or they object and say "I need  
15    to change things."

16          **Q     Can you give me examples of when a**  
17    **customer has objected and why?**

18          A     Do you need -- this is not specific to  
19    her, to Ms. Greene. However, that -- it's common  
20    that we collaborate with a client to say, this is  
21    what we propose, and they come back and say, "I  
22    know that I'm going to have people out, I have  
23    blackout dates during this time that you proposed  
24    we do on-site training, can we push it a week or  
25    two?"

1           Q     Now, before the timeline, the proposed  
2     timeline goes to the customer, does it go through  
3     the project manager?

4           A     The project manager and implementation  
5     consultant typically develop it together.

6           Q     Okay. So up until this point has the  
7     implementation consultant done anything  
8     independently without supervision by the project  
9     manager or review by the project manager?

10           MR. McKEEBY: Object to the form of the  
11     question as vague and ambiguous.

12           You can answer.

13           A     We have technical review calls which the  
14     implementation consultant could and typically does  
15     perform. They also are in receipt of the new  
16     contract. They can review that on their own. They  
17     can begin research on the client. All of this can  
18     be done without the project manager.

19     BY MR. HERRINGTON:

20           Q     They can begin research on the client,  
21     what does that mean?

22           A     Reviewing the contract, looking at the  
23     project and how it's been set up. Looking to see  
24     if they would make any recommendations based on  
25     what was the initial contract.



1           Q     Okay. Does the implementation consultant  
2     make any decisions that are not reviewed at a  
3     higher level?

4           A     On a daily basis.

5           Q     Like what?

6           A     Being on-site for a training with a  
7     client, the agenda isn't getting done and they make  
8     a decision that they're going to tell the client  
9     they need to come back on-site. And working with  
10    the client to get that built into the project  
11    timeline, stay longer that day maybe, work through  
12    lunch if they need to.

13                On-site is wholeheartedly their -- their  
14    work to work directly with the client to make sure  
15    that they're making progress with the client.

16          Q     Okay. So they'll make changes to the  
17    timeline without going through the project manager?

18          A     Typically on-site it could or could not  
19    regard timeline changes. If they can fit it within  
20    the timeline that's been proposed, that's the  
21    preference so that we can keep clients and  
22    resources on-site.

23                If a change does need made, there are  
24    examples that the implementation consultant will  
25    make that recommendation as well.

1           **Q     Tell me, what is a technical review call?**

2           A     That is where we get on with the client  
3     and review questions to set up their system.

4                     Are you going to want to use our email  
5     system?   Do you have an SMTP service?

6           **Q     What is that?**

7           A     It's an email protocol.

8           **Q     Okay. Are the questions that you go**  
9     **through with the client on a technical review call,**  
10    **is that from a master list of questions?**

11          A     It can be, but it's up to the discretion  
12    of the implementation consultant to know what  
13    questions to ask, what not to ask, what to  
14    elaborate on.

15          **Q     What kind of questions could be omitted?**

16          A     If they did not purchase time clocks,  
17    maybe the implementation consultant could say, how  
18    are you going to be logging in your time? I'd make  
19    a recommendation you add time clocks. Or you don't  
20    have them on your contract, we're not going to  
21    discuss that.

22          **Q     Are you aware of any instances of**  
23    **Ms. Greene making a recommendation that someone**  
24    **purchase time clocks?**

25          A     I don't have an exact example.

1           Q     Going back to Exhibit No. 2, Assess and  
2     Design. Is there anything we haven't discussed  
3     already that's in -- that would be under the  
4     umbrella of assess and design?

5                     Any steps in a typical project or have we  
6     come to the end of assess and design phase?

7           A     Assess typically goes throughout the  
8     entire life-style -- life span of the project.  
9     Design we've discussed.

10          Q     Okay. Well, okay, so where does install  
11     begin? That's when you send it to the deployment  
12     team?

13          A     Correct.

14          Q     Okay. Now, are you as a project manager  
15     involved in the install or -- or does the  
16     deployment team simply report back to you once it's  
17     been installed?

18          A     If there are issues, the project manager  
19     and the implementation consultant are kept  
20     up-to-date about those. Maybe the client didn't  
21     have the server ready when they needed to, that  
22     would be an example.

23          Q     Okay. This second arrow labeled  
24     "Install," is that a fairly discrete short phase of  
25     the physically installing it and then moving on to

1     **training?**

2           A     These are very high level and an example.  
3     And some of these can intersect throughout the  
4     entire project.

5           Q     Okay. Well, other than being updated on  
6     how the installation is going and any stumbling  
7     blocks that have been encountered in the  
8     installation, does the implementation consultant  
9     have any further role in the actual install?

10          A     Install can also encompass making sure  
11     that the client gets logged into the system and has  
12     user capabilities to log in and verify installation  
13     as well.

14          Q     Now, when Ms. Greene started, she was  
15     hired by ExecuTime as a project manager, correct?

16          A     I believe so, project manager/trainer.

17          Q     Okay. Now, her job title changed to  
18     implementation consultant, correct?

19          A     It did.

20          Q     Okay. Now, some of the people who were  
21     project managers stayed project managers with  
22     Tyler, correct?

23                     And essentially the people who were  
24     designated by ExecuTime as project managers, some  
25     of them became -- some of their titles changed to

1 implementation consultant and some did not; is that  
2 correct?

3 A I believe it was senior project manager  
4 that stayed that way.

5 Q So what was the project manager became a  
6 senior project manager?

7 A No, a senior project manager stayed a  
8 senior project manager.

9 Q Okay. And did project managers -- so all  
10 project managers from ExecuTime became  
11 implementation consultants for Tyler?

12 A I'm not aware of that.

13 Q Okay. Do you know someone named MyKeya  
14 Henderson?

15 A I do.

16 Q Okay. Now, was she employed by ExecuTime  
17 as well?

18 A She was.

19 Q Okay. At the beginning?

20 A Yes.

21 Q And what was her position at that time?

22 A I don't recall.

23 Q Okay. Now, she was promoted to project  
24 manager at some point?

25 A She was.

1 Q Okay. So she was an implementation  
2 consultant for Tyler at some point as well?

3 MR. McKEEBY: After the acquisition?

4 BY MR. HERRINGTON:

5 Q After the acquisition, yeah, obviously  
6 because Tyler -- yeah.

7 A Yes.

8 Q Okay. So she was an implementation  
9 consultant. Do you know approximately when she was  
10 promoted?

11 A I don't have the exact date.

12 Q Okay. Do you know what year?

13 A I don't.

14 Q Okay. So the install can also include  
15 checking to make sure that the customer can access  
16 the software and has -- I suppose it starts with  
17 just an administrator login, is that the first  
18 step?

19 A There is an administrator login.

20 Q Uh-huh.

21 A Other users can be created.

22 Q Okay. Are ExecuTime employees involved  
23 in creating those profiles or does the customer do  
24 it themselves?

25 A It would be a collaboration. It could be

1 both.

2 Q Could it be either/or?

3 A Typically, the implementation consultant  
4 would be responsible for that. And then train the  
5 client staff on how to maintain and manage those.

6 Q Do different employees of the customer  
7 get different levels of access to ExecuTime  
8 software?

9 A Based on their preference, yes.

10 Q The customer's preference?

11 A Correct.

12 Q Okay. Are there standard levels of  
13 access that can -- that you could label?

14 A The client chooses what they're labeled.

15 Q Okay. Are there a certain number of  
16 different levels of access that correspond to  
17 certain areas within the software?

18 A Not a certain level, but each one can be  
19 designated to a specific security and access.

20 Q So specific functions can be assigned to  
21 specific profiles?

22 A Correct.

23 Q Okay. Anything else happening in  
24 installation after that point?

25 A Not that I recall.

1 Q Okay. So training would begin next?

2 A Overlap of assess and design would  
3 continue --

4 Q Uh-huh.

5 A -- to take the questionnaire and the  
6 solution design and prepare for training. Set up  
7 the templates we discussed.

8 Q What about prior to training identifying  
9 problems with the software? We talked about that  
10 briefly. But there's a concept of writing a  
11 ticket, correct?

12 A Yes.

13 Q Then that would be noting some sort of  
14 technical problem that gets passed on to technical  
15 employees of Tyler?

16 A If there was an issue.

17 Q Okay. Is that part of the install  
18 process, too, or is that part of assess and design?

19 A It can overlap.

20 Q When the training, is that -- is training  
21 done sitting side by side with a customer at their  
22 own computer, you know, using their real software  
23 or is it done, for example, with sort of a mockup?

24 A It uses their own software.

25 Q Okay. So training is done all on their



1 own software?

2 A Correct.

3 Q Not on a template or a mockup?

4 A Correct, it is on their software.

5 Q Has that been the case the entire time?

6 A They have their own environments and we  
7 utilize those.

8 Q Okay. I've seen a lot of training videos  
9 where Ms. Greene has, you know, recorded her actual  
10 trainings, and she'll write, you know, a user --  
11 set up a user called Joe Hourly. Is she doing that  
12 in the customer's actual software?

13 A Yes.

14 Q Okay. So screen shots are not used in  
15 training?

16 A Not typically.

17 Q ExecuTime sells the license to the  
18 software along with the servicing of it and  
19 installation, for example. Does it make money in  
20 any other way?

21 Does it -- you know, are its revenues  
22 generated from anything else other than the  
23 licensing of software and servicing of it?

24 A I'm not sure.

25 Q Okay. Does Tyler actually -- I

1 understand that Tyler upgrades and develops  
2 software, but does it create any of the soft --  
3 create software from the ground up?

4 MR. McKEEBY: Object to the form of the  
5 question.

6 You can answer if you understand.

7 A ExecuTime was created from the ground up,  
8 but Tyler did acquire that. As far as any outside  
9 from the ground up, I'm not aware.

10 BY MR. HERRINGTON:

11 Q Are you aware of any -- any of the  
12 software that we've discussed today that Tyler  
13 built itself from the beginning versus acquired it  
14 from another company?

15 MR. McKEEBY: Object as outside the scope  
16 of the corporate topics -- corporate representative  
17 topics.

18 You can answer if you know.

19 A It's an assumption, but I believe that  
20 Tyler Munis was. But that's a personal response.

21 BY MR. HERRINGTON:

22 Q On Topics No. 2 and 3 on the notice of  
23 deposition, you'll see that we've asked about, you  
24 know, the percentage share of revenues derived from  
25 implementation consulting services and from project

1 management implementation, consulting go live and  
2 technical support services.

3 Is there any information you can give me  
4 about those topics about how much of Tyler's  
5 revenues come from the implementation consultant  
6 work?

7 A We don't track it this way.

8 Q Now, an implementation consultant may  
9 escalate a problem that a customer has identified  
10 to another department, correct?

11 A Yes.

12 Q Okay. How does an implementation  
13 consultant choose whether to escalate a problem?

14 A They are typically expected to perform  
15 trouble-shooting steps themselves, try the things  
16 that they may have recorded, is this set up  
17 correctly, did I add the file where I needed it to  
18 go.

19 I'm speaking strictly in this example  
20 about integration that needed to happen between  
21 payroll data and ExecuTime.

22 Is it coming over how it should be coming  
23 over. And if it's not and I've done all of those  
24 steps to the best of my ability and what I know as  
25 an implementation consultant, I would escalate to a

1 technical service manager or a team member.

2 Q So they would do it if they cannot solve  
3 the problem themselves?

4 A Correct.

5 Q Okay. Now, you talked about integration.  
6 So my understanding is that their payroll data may  
7 be kept in non-ExecuTime software?

8 A Correct.

9 Q Okay. And it needs -- the two software  
10 need to communicate with each over?

11 A Yes.

12 Q And the payroll data needs to be  
13 populated into ExecuTime?

14 A By preference, yes.

15 Q Okay. You know, are there standard types  
16 of files that -- like industry standard files that  
17 -- file types that, you know -- that time and  
18 payroll software typically use so they can  
19 communicate with each other?

20 A Tyler specifically.

21 Q No, I just mean -- I mean, you can't  
22 control what type of payroll software your client  
23 had preexisting, correct?

24 A I cannot control that, no.

25 Q Yeah.

1           So I assume that Tyler's time and pay  
2   software -- or Tyler time and attendance software  
3   is designed so that it can -- it can understand  
4   data coming from lots of different types of  
5   software?

6           A     Yes, and different integrations are set  
7   up specifically to many different payroll systems.

8           Q     Okay. But do different payroll systems,  
9   do they speak a common language that can, you know,  
10   that can be understood between them? Is the data  
11   organized in ways that -- that is common to all of  
12   them?

13          A     There are different intricacies about  
14   each payroll system, specifically ones that are  
15   Tyler payroll systems as well that we have  
16   integrations. And there are several different ways  
17   to connect and gather that data.

18          Q     Okay. And is that part of the deployment  
19   team's job to make sure that they can talk to each  
20   other?

21          A     Not typically.

22          Q     Who does that?

23          A     The implementation consultant.

24          Q     Okay. So the implementation consultant  
25   has training on lots of different payroll systems

1     **used in the industry?**

2           A     They have knowledge on several payroll  
3     systems, but what they do have is knowledge on and  
4     access to how that data integrates with ExecuTime.

5           Q     **Okay. Can they choose to make changes to**  
6     **the payroll system, to the customer's payroll**  
7     **system rather than to make changes to ExecuTime?**

8           A     They can work with the client to  
9     recommend changes based on how it would work within  
10    ExecuTime.

11          Q     **Okay. Are you aware of any instances of**  
12    **Ms. Greene ever doing that?**

13          A     I am aware of her working with clients to  
14    say terminated employees aren't -- are coming over  
15    still and that shouldn't be. We don't want  
16    terminated employees to come into ExecuTime. And  
17    working with the client directly to trouble-shoot  
18    why that was happening.

19          Q     **Can you tell me a specific project that**  
20    **happened on?**

21          A     Turlock, California.

22          Q     **Okay. I noticed that -- that Turlock and**  
23    **Hendersonville are two projects that Tyler produced**  
24    **documents relating to.**

25          A     Yes.

1           Q     Okay. Why were those projects chosen  
2 particularly out of the 300 that she worked on?

3           A     They were recent projects and they were  
4 on the list. Much like the contracts that were  
5 provided to you, there wasn't a specific use case  
6 for those.

7           Q     So can you guarantee that those projects  
8 are representative of what kind of advice she might  
9 have been giving throughout her employment from the  
10 very beginning, given that they were chosen with no  
11 rhyme or reason?

12           MR. McKEEBY: Object as mischaracterizing  
13 her testimony.

14           MR. HERRINGTON: Those were her words  
15 earlier.

16           MR. McKEEBY: No rhyme or reason? Not  
17 respect to those projects, that was with respect to  
18 the contracts. So you are mischaracterizing her  
19 testimony.

20 BY MR. HERRINGTON:

21           Q     And you said that you chose these much  
22 like the contracts that were produced?

23           MR. McKEEBY: She didn't use those terms.  
24 Anyway, you can answer.

25           A     Can you repeat the question, please?

1 BY MR. HERRINGTON:

2 Q When these documents relating to  
3 Hendersonville and Turlock were produced to us,  
4 were they cherrypicked to show specific things that  
5 Ms. Greene did that would support your defenses?

6 MR. McKEEBY: Object to the form of the  
7 question as outside the scope of the notice.

8 You can answer if you know.

9 BY MR. HERRINGTON:

10 Q Was Turlock project chosen for production  
11 for the reason that the company believed that it  
12 would show the exercise of discretion and  
13 independent judgment rather than because it was  
14 representative of Ms. Greene's work as a whole?

15 MR. McKEEBY: Same objection, outside the  
16 scope of the notice.

17 And you can answer if you know.

18 A I would describe her duties, primary  
19 duties as judgment and therefore --

20 BY MR. HERRINGTON:

21 Q That's not my question.

22 A I would believe that I picked --

23 MR. McKEEBY: Let her finish. I agree,  
24 but let her finish.

25 A I believe --



1 BY MR. HERRINGTON:

2 Q You can say whatever you want when he  
3 redirects you at the end. I want you to answer the  
4 question that I asked.

5 MR. McKEEBY: Well, she can also finish  
6 her answer in response to yours. You can then tell  
7 her it's not responsive and ask for a follow-up  
8 question, but you can't interrupt her and tell her  
9 to stop talking.

10 A I believe I picked Turlock because it was  
11 a great use case. They were a great client. They  
12 had a reasonable -- a great implementation. And  
13 they are a client that is a reference of Tyler, and  
14 the implementation that was done.

15 BY MR. HERRINGTON:

16 Q How many different projects did you look  
17 at before deciding to produce Hendersonville and  
18 Turlock documents?

19 A I don't have an exact number that I  
20 looked at.

21 Q Do you have an approximate number?

22 A 50.

23 Q If you were looking at 50 different  
24 projects, why didn't you just produce all the  
25 documents you looked at?

1 MR. McKEEBY: Object to the form of the  
2 question and object as outside the scope of the  
3 notice.

4 You can answer, if you know.

5 A I chose the projects that were given  
6 because it met the request of the scope.

7 BY MR. HERRINGTON:

8 Q Did you produce all of the documents  
9 showing Ms. Greene's work on the Turlock and  
10 Hendersonville projects?

11 MR. McKEEBY: Again, object to the form  
12 of the question as outside of the scope of the  
13 notice.

14 You can answer, if you know.

15 A I produced -- I did not. I produced what  
16 was requested.

17 BY MR. HERRINGTON:

18 Q How often did Ms. Greene make  
19 recommendations to Tyler's customers about making  
20 changes to their payroll systems?

21 A I don't have a specific example. I would  
22 say that it would depend upon the client and the  
23 payroll system that they had.

24 It was an implementation consultant's  
25 duty to make sure at the end the client was happy.

1 And if that required a payroll change, whether it  
2 be simple or larger, then that would be  
3 recommended.

4 **Q Are you aware of any specific instances**  
5 **other than Turlock?**

6 MR. McKEEBY: For Ms. Greene?

7 BY MR. HERRINGTON:

8 **Q For Ms. Greene?**

9 A I do not have examples.

10 **Q So in the 50 other projects that you**  
11 **reviewed, that was the only one you could find; is**  
12 **that correct?**

13 MR. McKEEBY: Object to the form of the  
14 question as mischaracterizing previous testimony.

15 You can answer.

16 A That is not correct.

17 BY MR. HERRINGTON:

18 **Q Okay. So you did see her making**  
19 **recommendations to change software in other**  
20 **projects?**

21 A Possibly. I did not search for that  
22 description.

23 MR. McKEEBY: Can we go off the record  
24 for a second?

25 MR. HERRINGTON: Sure.

1 (Off the record.)

2 (Lunch recess.)

3

4 \* \* \* \* \*

5

6 (Deposition Exhibit 4 marked.)

7 BY MR. HERRINGTON:

8 Q Ms. Pasch, I've given you a document  
9 labeled Plaintiff's Exhibit 4. Can you tell me if  
10 you recognize it?

11 A I do.

12 Q And what is it?

13 A An implementation consultant job  
14 description.

15 Q Now, I see a date at the top 1/1/11. Do  
16 you see that?

17 A I do.

18 Q And that's the date this document was  
19 created?

20 A I would assume.

21 Q Okay. Is this a document that accurately  
22 describes Ms. Greene's job?

23 A An implementation consultant?

24 Q Uh-huh.

25 A As job duties -- job descriptions do,

1 yes.

2 Q Was it an accurate description of all the  
3 implementation consultants at Tyler Technologies?

4 A I believe so.

5 Q As a matter of fact, this was created  
6 before Tyler acquired ExecuTime, correct?

7 A If it was created on 2011, yes.

8 Q Okay. What is a data mapping process  
9 that's referenced at the third bullet point?

10 Is that what we talked about earlier,  
11 integrating payroll with time and attendance?

12 A I would assume so.

13 Q And product conversion would refer to  
14 converting the data over to ExecuTime?

15 A Typically.

16 Q Okay. What is the client SharePoint site  
17 that's referenced in the fifth bullet point from  
18 the bottom under Principal Duties?

19 MR. McKEEBY: What bullet?

20 MR. HERRINGTON: The fifth from the  
21 bottom of Principal duties. It ends with "and  
22 updating the client's SharePoint site."

23 MR. McKEEBY: All right.

24 A To my knowledge, this is where client  
25 documents, project timelines, typically would be

1 stored. ExecuTime didn't necessarily use that.

2 BY MR. HERRINGTON:

3 Q Okay. Is it like a portal for the  
4 clients to access their -- their Tyler-related, you  
5 know, documents?

6 A Before an implementation, I believe, yes.

7 Q What is QA Staff referenced in the third  
8 from the bottom bullet point under Principal  
9 Duties?

10 A Quality assurance staff.

11 Q Yeah, who are they?

12 A Typically development staff.

13 Q Okay. So we talked about different teams  
14 earlier. There was -- you know, we had the sales  
15 reps and then we had the management, the  
16 implementation management people.

17 A Uh-huh.

18 Q And then the implementation team. We had  
19 the installation team, was it?

20 A Deployment.

21 Q Deployment team.

22 So where are the QA located? Are they a  
23 different team?

24 A They are in the development team.

25 Q So development team is a separate team?

1 A Of ExecuTime.

2 Q Okay. Do they have a point in time in  
3 the project timeline or are they overarching over  
4 the whole lifetime of the project?

5 A They're separate from implementation.  
6 They develop the product itself.

7 Q Okay. So they're really not -- do  
8 implementation consultant's...

9 Okay. So if an implementation consultant  
10 is assisting QA staff, it's not related to a  
11 specific customer project?

12 A It could be if a client was awaiting an  
13 item that was in quality assurance.

14 Q So would this be like a functionality  
15 that had not been previously designed?

16 A Or a fix to a bug.

17 Q Can you give me examples of what an  
18 implementation consultant might do to assist QA  
19 staff?

20 A If a version was under what is called an  
21 RC or release candidate of ExecuTime, they could  
22 potentially test a bug that previously existed in  
23 an alternate version to make sure it worked before  
24 presenting it to the client.

25 Q So it would be a preexisting -- an

1     **already known bug?**

2           A     In that particular example, yes.

3           **Q     Okay. Any other examples?**

4           A     No. Functionality that comes out with a  
5     version, testing it to make sure that it fits in  
6     the software.

7           **Q     Okay. Would that be connected with a**  
8     **particular customer project?**

9           A     Not necessarily.

10          **Q     Are you aware of Ms. Greene ever doing**  
11     **that?**

12          A     This would have been a common job of an  
13     implementation consultant?

14          **Q     Okay. Are you aware of any documents**  
15     **that reflect her doing that?**

16          A     I don't know.

17          **Q     Now, on the seventh bullet point down, it**  
18     **says: Create customer ports or customize existing**  
19     **reports to satisfy client requirements.**

20                   **What are custom reports -- or what are**  
21     **reports rather?**

22          A     Reports are typically pulled from data  
23     that's within a client's software. An example  
24     would be access security report in ExecuTime, who  
25     had roles assigned to them, how do I set those



1 parameters, and that is what she would assist with.

2 Q Would she decide who would have access to  
3 different parameters?

4 A She would work with the client to decide  
5 security role-wise who had access to different  
6 reports.

7 Q What kind of criteria would be used to  
8 decide that?

9 A Based on whether or not the employee --  
10 who was assigned to the role would need access to  
11 that particular report.

12 Q But who would decide if they need access?

13 A The client would, with her tutelage.

14 Q Do you have any knowledge of examples of  
15 her giving tutelage?

16 A That would have been throughout an  
17 implementation cycle. Reports are covered through  
18 various trainings.

19 Q Okay. But are you aware of any specific  
20 documents that would actually memorialize her  
21 giving that advice?

22 A I'm not aware of specific documents.

23 Q I notice on the second page under  
24 Education, Experience, Special Skills, it doesn't  
25 require any previous experience using time and

1     **attendance software; is that correct?**

2           A     It does not list that.

3           Q     **Okay. Is that, in fact, a requirement?**

4           A     It's not a requirement.

5           Q     **Okay. Do you know if any implementation**  
6     **consultants have been hired who did not have**  
7     **knowledge of principles and concepts in accounting**  
8     **prior to their employment with Tyler?**

9                   MR. McKEEBY: Object to the question as  
10    outside the scope of the corporate representative  
11    notice.

12                   I'll allow you to -- you can answer.

13           A     I do not know.

14    BY MR. HERRINGTON:

15           Q     **What computer systems are -- are they --**  
16    **you know, it says computer systems and Microsoft**  
17    **office products. What kind of computer systems are**  
18    **required for someone to be hired as an**  
19    **implementation consultant?**

20           A     Familiarity with a Microsoft operating  
21    system.

22           Q     **You mean Windows?**

23           A     Correct.

24           Q     **Is that it?**

25           A     There could be others.

1 Q Well, are there others for the hiring of  
2 an implementation consultant?

3 A Familiarity with use of web browsers  
4 would also be one of them since our product is web  
5 browser based.

6 Q Okay.

7 (Deposition Exhibit 5 marked.)

8 BY MR. HERRINGTON:

9 Q I'm handing you a document that's been  
10 marked as Plaintiff's Exhibit No. 5.

11 MR. McKEEBY: This was produced by you  
12 guys?

13 MR. HERRINGTON: It was.

14 MR. McKEEBY: Okay.

15 BY MR. HERRINGTON:

16 Q So these were pay stubs that we produced  
17 in discovery. Can you tell me if Tyler maintains  
18 similar documents for the entirety of Ms. Greene's  
19 employment?

20 I'll just represent that if -- they  
21 weren't produced. We didn't get any additional pay  
22 stubs. These are just a few that she had access to  
23 and I'm wondering, you know, why we don't have her  
24 complete payroll documents?

25 MR. McKEEBY: So your question is, does

1 Tyler have the complete payroll documents?

2 MR. HERRINGTON: Uh-huh.

3 MR. McKEEBY: Okay. You can answer.

4 A I don't know, but I would assume so.

5 BY MR. HERRINGTON:

6 Q Okay. Do you know of any specific reason  
7 why they haven't been produced?

8 A I do not.

9 MR. McKEEBY: Do you want us to check on  
10 that, Matt?

11 MR. HERRINGTON: I would.

12 MR. McKEEBY: I will do that.

13 MR. HERRINGTON: But I'll have -- I'm  
14 going to have a list of stuff after to follow up  
15 on, so...

16 MR. McKEEBY: That's fine. But this will  
17 give me something to be able to send around and  
18 say, hey, can we get the rest of them that look  
19 like this.

20 (Deposition Exhibit 6 marked.)

21 BY MR. HERRINGTON:

22 Q All right. Next, would you please look  
23 at the document labeled No. 6. And could you  
24 identify it for me, please?

25 A This is the 2017 ExecuTime Implementation

1 Incentive Compensation Plan.

2 Q Is this not the same plan that was in  
3 place in 2016?

4 A Because it's a Tyler document, I would  
5 assume no.

6 Q Okay. Are you aware if -- was a  
7 comparable plan in place in 2016?

8 MR. HERRINGTON: Off the record.

9 (Off the record.)

10 BY MR. HERRINGTON:

11 Q Did Tyler -- or did ExecuTime and Tyler  
12 -- or Tyler have a comparable incentive plan in  
13 place in 2016?

14 A I believe Tyler did, yes.

15 Q Okay. Now, this plan applies only to  
16 ExecuTime implementation consultants?

17 A This one, correct.

18 Q The references under No. 2 on the bottom,  
19 Implementation Managers. What is that?

20 A That would also be referred to as  
21 managers of implementation which was referenced  
22 before.

23 Q Okay. So above the project manager?

24 A Correct.

25 Q Okay. So this is not just for

1 implementation consultants, it's for the entire  
2 implementation team?

3 A Correct, implementation incentive  
4 compensation plan.

5 Q Yeah.

6 Okay. Turning to the second page, I see  
7 Work Type -- columns Work Type, Description. I  
8 think those are fairly self-explanatory. Can you  
9 explain what the other columns mean?

10 A The third column means project manager of  
11 time and attendance.

12 Q Uh-huh.

13 A Project manager of advanced scheduling.  
14 And project manager tech implementation consultant  
15 for time and attendance.

16 Q What is that?

17 A And that would be what team they're under  
18 and if they're eligible for the work type.

19 Q No, I mean, what is the project manager  
20 for tech?

21 A There used to be a separate team that was  
22 under implementation that was technical.

23 Q Okay. So during Ms. Greene -- during at  
24 least a portion of Ms. Greene's employment?

25 A Correct.

1           Q     Okay. Now, how did -- what job duties  
2     did that team have that -- and where are they now?  
3     Where did those duties go to?

4           A     They would have at the time been  
5     responsible for initial server deployments, payroll  
6     integration imports and technical trouble-shooting  
7     assistance.

8           Q     Okay. So that team no longer exists?

9           A     Under ExecuTime, correct.

10          Q     Okay. So what happened to their duties?  
11     Where did they go? Where were they transferred to?

12          A     The initial server deployment was  
13     transferred to the deployment team. And the  
14     payroll integration import, depends, but it's  
15     throughout the implementation team and the  
16     technical services team.

17          Q     Did the implementation consultant take on  
18     any responsibilities that the project manager of  
19     tech had previously?

20          A     They would work in collaboration with the  
21     project manager for time and attendance to obtain  
22     sign-offs on the integration. They would prep for  
23     integration. And dependent upon the type of  
24     integration, they would perform the integration.

25          Q     Okay. Let's keep going through the

1 columns. The next one is Implementation Consultant  
2 for Time and Attendance. This is the fourth,  
3 right?

4 A Yes.

5 Q And then the next one?

6 A Implementation Consultant for Advanced  
7 Scheduling.

8 Q Uh-huh.

9 A The estimated billable days. And it  
10 supports a billable milestone.

11 Q And what does that mean?

12 A Each milestone at this point was given a  
13 percentage based upon the work that was completed.  
14 The top example for solution design and timekeeping  
15 was 20 percent due at a project design and hardware  
16 install, which at the time was when we would bill  
17 the client based on a milestone contract.

18 Q So was there a new incentive plan  
19 designed after the tech team was done away with?

20 A I am not aware of that.

21 MR. HERRINGTON: Okay. That's something  
22 that we'd want, too, if it, in fact, happened  
23 during her employment.

24 BY MR. HERRINGTON:

25 Q Tell me the difference between the time



1 and attendance implementation consultant and the  
2 advanced scheduling implementation consultant. Is  
3 it just a difference of which modules they can work  
4 with?

5 A Correct.

6 Q Okay. What was Ms. Greene?

7 A She started with the advanced scheduling  
8 team when she was hired.

9 Q Uh-huh.

10 A And then moved to the time and attendance  
11 team.

12 Q How long was she on advanced scheduling?

13 A I don't know the exact time.

14 Q Do you know if it was less than a year?

15 A I do believe so.

16 Q Are the two type of implementation  
17 consultants compensated differently?

18 A No.

19 Q But the advanced scheduling consultants  
20 have to be able to work with time and attendance as  
21 well?

22 A They need to know certain things about  
23 the product to be able to support it. They're the  
24 second module to be implemented.

25 Q So the two modules are implemented at

1 different times?

2 A They can be.

3 Q Okay. Do they have separate timelines?

4 A Typically.

5 Q Okay. So the advanced scheduling  
6 consultant would not necessarily -- the first part  
7 would be finished to a certain degree before they  
8 would get involved?

9 A A certain portion of the project would  
10 need to be completed, yes.

11 Q Okay. Now, all of the work types here,  
12 are these all billable types of work?

13 And let me back up for a second.

14 Tyler implementation consultants track  
15 both billable and nonbillable time, correct?

16 MR. McKEEBY: Object to -- well, object  
17 to the form of the question.

18 You can answer. It's -- you can explain  
19 it to him why his question may be difficult if it  
20 is.

21 A It depends upon the stage of -- that  
22 you're referring to.

23 BY MR. HERRINGTON:

24 Q Okay. Can you explain how it would be  
25 different in different stages?

1           A     Up to a certain point we did require that  
2     as we required at least 40 hours to be submitted on  
3     a time sheet. So nonbillable time could have been  
4     recorded. Maybe not everything, although, we asked  
5     for everything.

6           Q     Uh-huh.

7           A     And then we moved to a model where we  
8     just wanted tracking of billable time, potential  
9     rework time, and what you asked about it being  
10    billable or not, and rework would not be.

11          Q     Rework was fixing something that was done  
12    incorrectly?

13          A     Correct.

14          Q     So an error that was not due to the  
15    client?

16          A     Yeah.

17          Q     Okay. Do you know when that change  
18    happened, the timekeeping change?

19          A     November of 2018.

20          Q     Okay. So are all of the types of work  
21    listed here time that would be billed to the  
22    client?

23          A     No.

24          Q     Okay. What would not?

25          A     Integration rework.

1 Q Where is that?

2 A Page 5 of 6.

3 Q Okay.

4 A And IC or PM rework, Page 4 of 6.

5 Q And the "no" or "yes" means that the time  
6 spent on this counts towards incentive bonuses?

7 A Whether or not they were eligible at the  
8 time.

9 Q Okay. So nobody would be eligible for  
10 incentive bonuses based on time spent on rework?

11 A Typically, no.

12 Q Now, let's look -- if you compare the two  
13 types of implementation consultants throughout this  
14 chart, they're all identical except for one, the  
15 Time Device Training; is that correct?

16 MR. McKEEBY: Where is that one?

17 BY MR. HERRINGTON:

18 Q I'm sorry, on 4. But I want you to read  
19 the whole thing, confirm that's the only one that's  
20 different.

21 A No.

22 Q That's not the only one?

23 A No.

24 Q Did I miss something?

25 Supervisor Training Session. Okay.

1     **That's different as well?**

2           A     Correct.

3           Q     **Those are the only two?**

4           A     Listed on this document, yes.

5           Q     **Okay. So under this incentive plan?**

6           A     Correct.

7           Q     **Okay. Are you aware of the reasoning**  
8     **behind that distinction between the two types?**

9           A     For supervisor training, the time and  
10    attendance would likely not train on the advanced  
11    scheduling modules.

12          Q     **Okay. That makes sense.**

13          A     And for time device training, typically  
14    those were set up prior to advanced scheduling's  
15    implementation. They needed to be to get the  
16    people to login to be paid for clocking their time.

17          Q     **Now I'm really confused. It looks like**  
18    **the time and attendance consultants are the ones**  
19    **eligible for incentive pay based on time spent on**  
20    **supervisor training on advanced scheduling. Are**  
21    **those "yes" and "no" backwards?**

22                    **Because the time and attendance**  
23    **consultant shouldn't even be working on advanced**  
24    **scheduling, right?**

25          A     One moment.

1 Q Uh-huh.

2 A I'm not certain why that's the case on  
3 this document.

4 Q Okay. Is it possible that that's a  
5 mistake?

6 A It could just be I don't have the  
7 knowledge as to the advanced scheduling side with  
8 relation to this incentive plan.

9 Q But you can confirm that typically you  
10 wouldn't expect a time and attendance consultant to  
11 work on advanced scheduling?

12 A Typically not. It could happen.

13 Q And you typically would not expect an  
14 advanced scheduling consultant to work on time  
15 device training?

16 A Correct.

17 Q Okay. All right. I'm going to hand you  
18 two documents, Nos. 7 and 8.

19 (Deposition Exhibit 7 and Exhibit 8  
20 were marked.)

21 BY MR. HERRINGTON:

22 Q All right. So take a moment to look  
23 through these.

24 My first question is, these are both  
25 related to a project that Ms. Greene worked on in

1 Hendersonville, Tennessee. And I'd like you to  
2 confirm that as to both documents.

3 A Correct.

4 Q Okay. Can you generally describe what  
5 these two documents are to help me understand them?

6 A Exhibit No. 7 is an account of  
7 professional service, including the breakdown of  
8 hours, the task which went to those hours, who it  
9 was performed by, and what the duration of hours  
10 were.

11 Q Is this all of the tasks performed in  
12 that -- from February 5th, 2018, through October  
13 18th, 2018, on the Hendersonville project?

14 A It should have been tracked that way,  
15 yes.

16 Q Okay. So this document is intended to be  
17 complete for all Tyler employee billable time on  
18 that project?

19 A All ExecuTime.

20 Q Well, yes.

21 A Yes.

22 Q Okay.

23 A Not necessarily the project, but from  
24 February on. This project began before February.  
25 It was not tracked this way before then.

1 Q I see.

2 How was it tracked before February of  
3 2018?

4 A I'm not quite sure.

5 Q Let's look at Document No. 8.

6 A Okay.

7 Q And can you explain -- I mean, there's --  
8 I see two parts. Starting on Bates Page 322, I see  
9 messages between people.

10 Prior to that, from 316 to 322, I see a  
11 list of what I understand to be tasks or tickets,  
12 ticket numbers or something like that. Can you  
13 explain what I'm looking at on that first -- the  
14 first section?

15 A Are you referring to the status  
16 underneath XTNI-5679 on the first page or are you  
17 referring to the subtasks?

18 Q Okay. Let's just describe the document  
19 as a whole first.

20 A This document was created from Jira,  
21 J-I-R-A, which is a ticket tracking system that  
22 ExecuTime and Tyler Technologies after acquisition  
23 utilized to track all the subtasks that would go  
24 into a project and additionally are added based on  
25 a consultant needing to add them.



1 Q Now, did you create this document?

2 A I printed this document.

3 Q Okay. So it's based on information in  
4 your system that you exported into this?

5 A Correct.

6 Q Okay. How long did it take you to export  
7 this info into this document?

8 A I don't recall.

9 Q You mean if you walked up to your  
10 computer at work, how long would you expect it to  
11 take you to go in and make a copy of this from  
12 scratch?

13 A The actual procedure, 15 minutes.

14 Q Okay. I see Attachments here, Project  
15 Meeting Notes. Are those included in -- is that  
16 represented in the comments that I see in the last  
17 several pages or are they just not here?

18 MR. McKEEBY: Where is the reference to  
19 attachments?

20 MR. HERRINGTON: Third of the way down  
21 the first page. Hendersonville Project Meeting  
22 Notes and Project Timeline Notes.

23 MR. McKEEBY: Gotcha.

24 A Comments are separate from attachments.

25 BY MR. HERRINGTON:

1 Q Okay. So those were not produced to us,  
2 correct?

3 MR. McKEEBY: The attachments.

4 A The attachments were not.

5 BY MR. HERRINGTON:

6 Q Okay. I see a field at the top called  
7 Priority Medium, correct?

8 A Correct.

9 Q What does that mean?

10 A Jira assigns a project priority. We did  
11 not utilize that.

12 Q So everything's medium?

13 A Everything would be printed out likely  
14 medium, yes.

15 Q Are there any other fields here that are  
16 simply not utilized?

17 A Votes.

18 Q Uh-huh.

19 A And estimates could or could not be used.

20 Q So in this case is it safe to say that  
21 Remaining Estimate was not used?

22 A Correct.

23 Q And Original Estimate was not used?

24 A Correct.

25 Q Okay. Time Spent, whose time is that

1     **referring to?**

2           A     Are you talking about the --

3           **Q     Oh.**

4           A     -- sum of time spent or the second time  
5     spent?

6           **Q     You're right, I didn't see -- what is**  
7     **sigma of time spent?**

8           A     I'm assuming that means sum of time  
9     spent.

10          **Q     Okay. So on this project 5 weeks, 3**  
11     **hours and 59 minutes of work had been performed?**

12          A     That were acted for in the Jira ticket,  
13     not necessarily outside of it.

14          **Q     What would not be on the Jira ticket?**

15          A     Time not added by the implementation  
16     consultant or project manager for some reason.

17          **Q     So work -- you mean added as in not on a**  
18     **ticket?**

19          A     Correct.

20          **Q     So tickets we referred to earlier for**  
21     **trouble-shooting?**

22          A     Tickets in Jira are separate than  
23     trouble-shooting tickets.

24          **Q     I see, okay. So what are tickets in**  
25     **Jira?**

1           A     They're subtasks that are typical to an  
2     implementation project with the addition of tickets  
3     that are needed based on the discretion of the  
4     implementation team.

5           Q     Okay. Under Assignee in this list of  
6     tickets, I see some of them are blank. Any idea  
7     there why?

8           A     No.

9           Q     Now, I see a lot of ellipsis under  
10    Summary. So from this document we can't actually  
11    read the full description of what the ticket --  
12    what the substance of the ticket was, correct?

13          A     Correct.

14          Q     Okay. Is that something you would be  
15    able to run this again so that it would actually  
16    print out?

17          A     Yes.

18          Q     And this is in a proprietary software  
19    system, right? It's not something I could open up  
20    on my computer at work, right?

21          A     Correct, you would need access.

22          Q     So you couldn't just send me the data to  
23    open it up, the native format as it were?

24          A     Right.

25          Q     Okay. Let's go down to Comments.

1                   **Now --**

2                   MR. McKEEBY:   What Bates number are we  
3   on?

4   BY MR. HERRINGTON:

5           Q       **The beginning of the Comments 322.**

6                   **Actually, before the comments begin, I**  
7   **see Description, Clocks, 2 Basic Clocks. So they**  
8   **ordered two basic time clocks?**

9           A       The assumption would be that they did.

10          Q       **Okay. And Payment Milestones. So is**  
11   **this a milestone-based project, contract? They're**  
12   **paying -- is this referring to the payments from**  
13   **the clients being due at certain milestones?**

14          A       They began this way, yes.

15          Q       **Okay. I see. And then the system**  
16   **changed?**

17          A       They -- if my recollection is correct,  
18   they went live and then required additional  
19   services. So Hendersonville would have a  
20   combination of milestone and additional hours.

21          Q       **Okay. Do you know if these comments say**  
22   **anything about the additional services being**  
23   **needed?**

24          A       I'm not sure.

25          Q       **Okay. You don't remember, okay.**

1                   Now, these look like they're emails that  
2   are tracked here; is that correct?

3           A     Underneath Comments?

4           Q     Uh-huh.

5           A     Yes.

6           Q     So these messages don't just exist inside  
7   the Jira system, they exist as standalone emails as  
8   well?

9           A     It depends. Jira has the capability to  
10   send emails as well.

11          Q     Okay. From -- but from your regular  
12   email, Tyler email account?

13          A     From your account within Jira.

14          Q     Okay. So you would have two different  
15   email addresses?

16          A     You would have the same email address,  
17   just a different account for Jira.

18          Q     So you could receive the same mail in  
19   Jira that you receive in Outlook?

20          A     No.

21          Q     No. Could you send the same emails from  
22   your account whether you're in Jira or in Outlook?

23          A     No.

24          Q     I think that's all I need on that.

25                   MR. McKEEBY: Go off the record just for

1 one second.

2 MR. HERRINGTON: Sure.

3 (Off the record.)

4 BY MR. HERRINGTON:

5 Q So we're through with the Hendersonville.

6 (Deposition Exhibit 9 marked.)

7 BY MR. HERRINGTON:

8 Q All right, would you please take a moment  
9 to look at Exhibit No. 9, and tell me if you  
10 recognize that?

11 A I do.

12 Q Okay. What is this?

13 A This is a listing of Project Tasks and  
14 Assignments.

15 Q For who?

16 A For the implementation team.

17 Q Okay. For the team as a whole?

18 A Manager, project manager and  
19 implementation consultant.

20 Q Who created this?

21 A I did.

22 Q When?

23 A March of this year.

24 Q Okay. So Ms. Greene stopped working in  
25 March of this year, correct?

1           A     I believe she was still employed by  
2     Tyler.

3           Q     Yes, but not -- she was on medical leave  
4     beginning in March?

5           A     I believe so.

6           Q     Okay. So does this reflect an existing  
7     state of affairs or were changes implemented in  
8     March of this year?

9           A     Changes were not implemented. This was a  
10    reflection of just listing everything out in a  
11    document.

12          Q     Okay. And what was the impetus for  
13    creating this?

14          A     Assistance with training new hires,  
15    updating existing employees, and having a record  
16    for the assistance with another Tyler entity.

17          Q     Okay. And was there an earlier version  
18    of this that was, you know, in place in March,  
19    before March?

20          A     These were tasks that were in Jira that  
21    were just put on paper.

22          Q     Okay. But Jira only deals with certain  
23    types of tickets, correct?

24          A     Jira would have been the entire  
25    implementation cycle and additional tickets that an



1 implementation consultant or project manager would  
2 have added.

3 Q Okay.

4 A These tasks would likely be in Jira as  
5 well.

6 Q So this contains a complete list of  
7 everything -- every type of task that would be  
8 involved in the implementation process?

9 A Not a complete list but a high level  
10 overview.

11 Q Okay. Now, Manager of Implementation for  
12 Timekeeping, Hillary. That's referring to you?

13 A It is.

14 Q And so your job has changed since this?

15 A It has.

16 Q Okay. What is a Technical Review Call?

17 A That is the call we discussed previously  
18 about asking the client questions pertaining to  
19 technical setup, do you want email, do you have  
20 time clocks.

21 Q Okay. On the second page I see Handoff  
22 to Implementation Consultant, to Project Manager,  
23 in the middle. Should that be from project  
24 manager?

25 A Yes.

1           Q     Okay. On the second page, it says:  
2     Items for project manager to handle while  
3     implementation consultant is working with client.  
4     Request and receive acceptance from client for  
5     integration (milestone acceptance).

6                     What is that?

7           A     Milestone acceptance is what you're  
8     referring to?

9           Q     Uh-huh.

10          A     Implementation requires signatures and  
11     sign-off from a client at each of these milestones  
12     listed here --

13          Q     Uh-huh.

14          A     -- to signify they agree to go on to the  
15     next step.

16          Q     Power User Checklist, what is that?

17          A     That is a checklist that is derived that  
18     must be met and signed off on as applicable  
19     throughout -- after the power user training.

20          Q     What is Power User Training?

21          A     That will be a training typically that  
22     happens between the -- well, happens between the  
23     implementation consultant and the client. Either  
24     on-site or remotely.

25          Q     What is a power user?

1           A       Someone who is considered typically in  
2   ExecuTime to have administrative capabilities  
3   within the system.

4           Q       **What is an end user?**

5           A       Typically an employee.

6           Q       **Who does not have administrative access?**

7           A       Correct.

8           Q       **Is there anyone else between those two**  
9   **levels?**

10          A       Super user.

11          Q       **Okay. So super user is beneath power**  
12   **user?**

13          A       It's just in a different capacity.

14          Q       **Do they have more restricted access?**

15          A       They have typically more access than an  
16   end user but less access than a power user.

17          Q       **Okay. Now, the Document Payroll Export**  
18   **Design, If Applicable. Why would it not be**  
19   **applicable?**

20          A       With Astone integrated clients, there is  
21   no payroll export design.

22          Q       **Could payroll be handled from within**  
23   **ExecuTime?**

24          A       No.

25          Q       **So why would they not have payroll?**

1           A       They do have payroll, there's just no  
2       design needed.

3           Q       **Okay. So it's ready to go just out of**  
4       **the box? It could be integrated immediately**  
5       **without any modifications?**

6           A       There are no customizations for the  
7       export between ExecuTime and an Asone client.

8           Q       **Asone?**

9           A       Yes, A-S-O-N-E.

10          Q       **And what does that mean?**

11          A       We have an integration between another  
12       Tyler payroll product to integrate. It's just  
13       referred to as Asone.

14          Q       **Now, is everything in this checklist on**  
15       **the first half of the second page done before the**  
16       **handoff to implementation consultant?**

17          A       No.

18          Q       **Okay. So you're doing some of that while**  
19       **the implementation consultant is working?**

20          A       Correct.

21          Q       **What is Confluence Update?**

22          A       Confluence is a system we use to track  
23       contact information for clients, payroll system  
24       information. If the system was installed, the site  
25       report is typically updated which would be URL

1 access links, et cetera.

2 Q Under Time Clocks, what is Build Device  
3 Profiles and Ping Clocks?

4 A Building a device profile would typically  
5 consist of adding an IP address within the  
6 application, building a name. And pinging the  
7 clocks would consist of can I get access to it,  
8 will it respond to my request of a ping.

9 Q Does it work?

10 A Correct.

11 Q Clock Network Configuration Call, what is  
12 that?

13 A That is typically held between the  
14 client's IT and Tyler Technical Services as well as  
15 the implementation consultant coordinating it to  
16 ensure that the network is config'd. There may  
17 also be a VPN that needs set up and that would  
18 happen on that call or previous to that call. And  
19 that would be a confirmation of it.

20 Q What is involved in coordinating the  
21 call?

22 A Scheduling time with each team, ensuring  
23 a set of prerequisites are taken care of.  
24 Obviously, obtaining time clock details.

25 Q What are the prerequisites that would

1     **have to be met?**

2           A     The time clocks are ordered and received.  
3     At least one of them is set up to the network, and  
4     a set of IP addresses is obtained.

5           Q     **Uh-huh.**

6           A     If needed, a VPN is set up and tested.

7           Q     **Okay. What is Integration Prep?**

8           A     Under the Integration area?

9           Q     **Uh-huh.**

10          A     Ensuring that --

11          Q     **Yes. Excuse me.**

12          A     Ensuring that if needed files are  
13     obtained from the client. You get -- as an  
14     implementation consultant get into ExecuTime and  
15     set up employee types.

16                You set up from the template that we  
17     previously spoke about about solution design. You  
18     make sure the system is prepared for integration.  
19     Are all of these prerequisites set up prior to the  
20     integration taking place.

21          Q     **Under Integration, Flat Files, Schedule**  
22     **Via TSM Team, can you tell me what that means?**

23          A     If during these two types of integration  
24     under this section, flat file would be receiving  
25     from the client, importing it into ExecuTime, and

1 then you would schedule that via the technical  
2 services team to actually perform that step.

3 Q The importing?

4 A Correct.

5 Q Okay. Asone Direct Connection, Perform  
6 the Integration. So the implementation consultant  
7 performs the integration herself?

8 A Correct.

9 Q Okay. Did Ms. Greene do this?

10 A I don't remember a case, but she would  
11 have been trained on it.

12 Q But you don't know if she actually ever  
13 did it?

14 A I believe she would have. I just do not  
15 know of a case.

16 Q Do you have any implementation  
17 consultants who have -- who were given tasks or  
18 have duties that are different than others based on  
19 their technical capabilities?

20 A No.

21 Q Integration Approval Call and Integration  
22 Approval.

23 No, let's back up.

24 What's involved in the integration when  
25 the implementation consultant performs it?

1           A       Ensuring that if it's Astone related, the  
2       implementation consultant would ensure that the web  
3       service connectivity is verified. They would also  
4       perform the actual integration within Tyler  
5       integration, which is a tab that's within the  
6       application.

7           Q       Uh-huh.

8           A       They would ensure that all the data comes  
9       in and then they would reach out to the client for  
10      integration approval.

11          Q       All right. Integration Approval  
12      Call/Integration Approval. The implementation  
13      consultant requests that the project manager reach  
14      out for milestone acceptance.

15                   What does that mean?

16          A       As soon as the integration approval call  
17      has occurred and they've got a verbal integration  
18      approval, they would reach out to their project  
19      manager and ask for them to, referring back up to  
20      the top of the document, request and receive  
21      acceptance for that milestone.

22          Q       Okay. Have you ever not accepted a  
23      milestone after the consultant calls?

24          A       Can you elaborate?

25          Q       The implementation consultant reaches out



1 to the project manager and says -- to obtain  
2 milestone acceptance. Are there any situations  
3 where the project manager has said, no, not  
4 accepting this?

5 A From the client side?

6 Q No, from the project manager.

7 A No.

8 Q So what is the project manager looking  
9 for to determine whether to accept it?

10 A They reach out to the client to receive  
11 acceptance.

12 Q Okay. And do they get that in writing?

13 A Yes.

14 Q Okay. Under that subsection, Job  
15 Costing. Do you see that?

16 A Yes.

17 Q What is that?

18 A Job costing typically refers to any  
19 number of categories in which jobs need to be  
20 allocated to. Projects, general ledgers,  
21 activities. Specific based on a client's needs.

22 Q I mean, is -- does this involve telling  
23 the customer how much something's going to cost?

24 A No.

25 Q Okay. So it's -- okay.

1                   **Holiday Schedule Build, what is that?**

2           A       ExecuTime has the capability to build out  
3   holiday schedules based on a client's designated 12  
4   to 13 holidays at their location that can be  
5   automatically pushed to their time card based on  
6   the date and number of hours. It's building that  
7   based on what the client provided.

8           Q       **Email set up in configuration.**

9           A       You would like that explanation?

10          Q       **Yeah, yeah, I'm confused. Why -- I mean,**  
11 **presumably the customer has email accounts already,**  
12 **so why are email accounts being set up by the**  
13 **implementation consultant?**

14          A       It's not the email themselves, it's how  
15 ExecuTime utilizes it. For example, Hillary Pasch  
16 at Tyler Technologies, I want to receive email to  
17 that address. ExecuTime has the capability to send  
18 notifications. It needs to be marked to receive  
19 email, it needs to say what notifications, it needs  
20 to be tested that that's working.

21          Q       **And the customer determines who receives**  
22 **what notifications?**

23          A       Correct.

24          Q       **Authentication, Configuration and**  
25 **Settings, please explain that.**

1           A       We offer two different types of  
2   authentication currently. One is ExecuTime  
3   authentication, meaning it's built into the system,  
4   how do you gain access to the system. We also link  
5   in with Windows authentication.

6           Q       **What is authentication?**

7           A       User name and then passwords.

8           Q       **Okay. Start recurring status calls with**  
9   **client. Is it nothing more than the very simple**  
10 **interpretation of calling the client periodically**  
11 **to check on how things are going?**

12          A       No.

13          Q       **Okay.**

14          A       This is specifically used for scheduled  
15 weekly or biweekly recurring calls in which an  
16 implementation consultant would check the status of  
17 the project, would answer outstanding items, would  
18 maybe offer advice on the need for more training.

19          Q       **Are you aware of any instances in which**  
20 **Ms. Greene advised customers that they should**  
21 **obtain more training?**

22          A       This would have been a reoccurring part  
23 of her job duties to elaborate or investigate based  
24 on where their status was. Are they making the  
25 timelines that they need to make, are they getting

1 -- and by getting it, I mean, are they  
2 understanding the material, are their checklists  
3 signed off on.

4 And in that case, she would make the  
5 judgment call to say "I would offer more training"  
6 or "I think I need to go on-site instead."

7 I do not have specific cases off the top  
8 of my head, though.

9 Q But it would be based on whether the  
10 employees or the power users -- in this case I  
11 think only power users have been trained, right?

12 A By the start of the reoccurring calls,  
13 correct. Throughout the entirety, no.

14 Q Okay. So based on -- whichever  
15 categories employees have been trained at that  
16 time, it's simply a question of do they understand  
17 what they're doing sufficiently?

18 A I think it has more to it than that. I  
19 think it would be what's my gut check feel because  
20 of my expertise as an implementation consultant.

21 Q What kind of criteria does that involve?

22 A It's more experience. It's hard to put a  
23 feeling on someone's personal gut check. My own  
24 would be are they not showing up to calls, are they  
25 involved or is someone vacuuming in the background.

1 It has happened. Those things.

2 You pick up on nuances with clients as  
3 you deal with them and want to ensure their success  
4 that you know you need to come in and make this  
5 judgment call.

6 Q Okay. And by judgment call, is the  
7 judgment call to offer them additional training?

8 A It is a request that they consider it.

9 Q Okay. And then the client decides  
10 whether or not to accept it?

11 A Correct.

12 Q Okay. What are Time Card mockups?

13 A Time cards are tested based on examples  
14 provided from the client to ensure overtime looks  
15 accurate, regular time looks accurate.

16 The implementation consulting is testing  
17 the system to ensure everything looks as it should  
18 prior to training the end and super user.

19 Q And how much does an implementation  
20 consultant typically spend on time card mockups?

21 A It would depend upon the size of the  
22 pilot group or the parallel testing group or the  
23 size of the client.

24 Q What about as a percentage of a project,  
25 of implementation consultant time spent on a

1 project? You know, I'm wondering how extensive  
2 this time card mocking up is in relation to the  
3 whole project.

4 A Uh-huh.

5 Q So I understand that the number of hours  
6 may change depending on how big the group of  
7 employees is. But is there some sort of more or  
8 less stable ratio of -- you know, can you say it's  
9 approximately this percentage of the project would  
10 be spent on that?

11 A I will add it also depends upon if that  
12 initial time card mockup went well.

13 Q Uh-huh.

14 A If it didn't, more time would need to be  
15 added. It would be difficult to pinpoint a number  
16 on it. On an average project, a time card mockup  
17 for an implementation consultant would be 5 to 10  
18 percent of their time.

19 Q Test Payroll Export, can you tell me what  
20 that is?

21 A That is taking the data that has been  
22 built into the test environment and actually  
23 performing the export into the payroll system. Was  
24 there an apples-to-apples comparison between the  
25 two.

1           Q     So you put in that they worked these  
2     hours. Somewhere there's this information about  
3     the mockup -- you know, the dummy employees  
4     information has gone into the system and see if  
5     it's populating the payroll correctly?

6           A     It wouldn't be a dummy employee, it would  
7     be an actual employee.

8           Q     Uh-huh.

9           A     Because we want those apples-to-apples  
10    comparison. We want to make sure before they  
11    perform parallel testing and go live that it's  
12    matching. That when you're dealing with people's  
13    money, it's accurate.

14          Q     So it's using real information but it's  
15    not actually -- they still have their old system in  
16    place at this time?

17          A     Correct.

18          Q     Okay. And you're seeing does it match  
19    what your old system, you know --

20          A     Yes.

21          Q     -- is generating?

22          A     Yes.

23          Q     Okay. Refresh Payroll From Test?

24          A     That should be production. So I would  
25    need a correction on that document. It should say

1 Refresh Production From Test. And what that refers  
2 to is a client has several different environments.  
3 We want to make sure that their test environment  
4 and production match to subsequently test  
5 accurately.

6 Q What are environments?

7 A Different applications. They typically  
8 have a production environment live. A test  
9 environment to get in and test, and, hey, how does  
10 this work. And a train environment that we could  
11 also potentially use.

12 Q Okay. So when you're using the client's  
13 real data in the training, that -- because it's in  
14 a different environment, it's not a permanent  
15 change to their system, is that how I understand  
16 it?

17 A You can make changes in those  
18 environments. They're intended to test things  
19 before putting it into fruition.

20 Q Okay. So typically you would think that  
21 I can play around with anything and make any kind  
22 of changes that I think would be useful to  
23 demonstrate this capability, but then when we back  
24 out of that environment, it's not going to affect  
25 the end user's environment?



1           A       That is the goal.

2           Q       Okay. If you-all didn't use so much  
3 jargon, this would be a lot easier.

4                   What's the First Parallel?

5           A       That is the test -- first  
6 apples-to-apples comparison of our data in  
7 ExecuTime to their payroll data.

8           Q       And you do that test twice?

9           A       We do. We would like at least two  
10 successful tests before considering them in  
11 production.

12          Q       Who actually does the tests?

13          A       The implementation consultant works with  
14 the client to perform the tests.

15          Q       Okay. So basically are they observing  
16 the client do the -- run some sort of procedure to  
17 see if the client is able to, for lack of a better  
18 word, get it to work?

19          A       They first perform a payroll export  
20 training in which they train them on how to do the  
21 process.

22          Q       Uh-huh.

23          A       That is to get a feel for can they do  
24 this on their own. They'll even typically perform  
25 it up to the point of execution out of ExecuTime to

1 prepare them to do the first and second parallel.

2 The consultant at this point is supposed to aid if  
3 they need to.

4 Q Okay.

5 A They want those to be very smooth.

6 Q Okay. So ideally at this point the  
7 customer's able to do it and it will match what the  
8 consultant's doing?

9 A That's the hope.

10 Q Okay. First -- there's no substantive  
11 difference between first and second parallel, just  
12 you expect the results to be better the second  
13 time?

14 A You expect the results to be the same  
15 both times.

16 Q Okay. But they're two different tests,  
17 so two different sets of data?

18 A Two different parallels, two different  
19 payrolls.

20 Q Okay. Now, are you talking about payroll  
21 cycles?

22 A Correct.

23 Q Okay. Not just one employee's payroll?

24 A Exactly.

25 Q Okay. And First Production Cutover?

1           A       They would have gone live or into  
2     production at this point. And this is the first  
3     time they've done this without their old system  
4     just utilizing ExecuTime data to produce their live  
5     employee pays.

6           Q       **Okay. And this is only the customer**  
7     **doing that?**

8           A       By that point that is the hope.

9           Q       **Okay. So I see the End of Project items**  
10    **follows that. If the first production cutover**  
11    **doesn't work the way it should, if the customer's**  
12    **still having a problem at that point, does it just**  
13    **go back to a parallel test?**

14          A       It would not typically get into  
15    production unless we had successful parallels.

16          Q       **Okay.**

17          A       If they had an issue with their go live,  
18    they would remain live, but we would work with them  
19    to resolve that issue.

20          Q       **Okay. Additional training even?**

21          A       Potentially, yes.

22          Q       **Okay.**

23          A       If that's what the implementation  
24    consultant recommended.

25          Q       **Okay. Documentation verification?**

1           A       It's an internal process in which the  
2       implementation consultant verifies everything is in  
3       one place, we have what we need. It's very nicely  
4       organized in one folder.

5           **Q       What's organized?**

6           A       The documents throughout the project. An  
7       example would be a holiday schedule that they had  
8       provided us. To build the holiday schedules  
9       mentioned previously, we would want to keep record  
10      of that.

11          **Q       So it's sort of just like your customer**  
12      **file for them?**

13          A       Correct.

14          **Q       And making sure everything is in the**  
15      **right place?**

16          A       Right.

17          **Q       Okay. So this is not -- you're not**  
18      **directly interacting with the customer at this**  
19      **point to do that unless you're missing something?**

20          A       Right.

21          **Q       Okay. CMI Warranty?**

22          A       The time clocks have a warranty that come  
23      along with them and this is the implementation  
24      consultant reaching out to the customer to verify  
25      serial numbers as well as warranty dates.

1 Q Okay. So their warranty begins at this  
2 point. You register their warranty?

3 A Essentially.

4 Q Okay. Miscellaneous Items, Keep Track of  
5 Hours. They're doing that -- this is the  
6 implementation consultant keeping track of their  
7 own hours?

8 A Correct.

9 Q Okay. Update Weekly Meeting Notes.  
10 Create Jira Tasks for Tickets and Outstanding  
11 items.

12 Now, I don't -- I see Create Jira tasks  
13 for tickets. What about the trouble-shooting  
14 tickets?

15 A Those would be in -- let me back up. At  
16 one point they would have been in Jira.

17 Q Uh-huh.

18 A Then we moved to a system called CRM.  
19 That's where all trouble tickets are typically kept  
20 now. I cannot tell you when that occurred.

21 Q Okay. But at this point, when this was  
22 created, it was still in Jira in March of this  
23 year?

24 A No. Jira tasks here would be for the  
25 implementation consultant to keep track of

1 terminated employees are pulling into ExecuTime.

2 Q Okay.

3 A I need to track who's managing that, what  
4 all my troubleshooting was, how much time I spent  
5 on it. That would be done in Jira.

6 Q Well, CRM already existed by the time  
7 this was created, right?

8 A Correct.

9 Q So where is the CRM trouble tickets in  
10 here?

11 A It's not listed.

12 Q Okay. It's just something that could  
13 have occurred at any stage?

14 A Correct.

15 Q Okay. What are Weekly Meeting Notes?

16 A Each start -- at the start of recurring  
17 status calls, implementation consultants are  
18 responsible for keeping meeting notes to recap this  
19 is what happened on the call, these were the  
20 resolutions, this is what I suggested. Meeting  
21 notes to provide to the client. And they are  
22 supposed to be sent after the call.

23 Q Okay. And SM Billing?

24 A Semi-monthly billing is what that stands  
25 for.

1 Q And this is for everyone except for the  
2 milestone and -- or, no -- yeah, everyone except  
3 for the milestone and the --

4 MR. McKEEBY: Paid in full.

5 BY MR. HERRINGTON:

6 Q -- paid in full clients?

7 A This is for all clients.

8 Q Why would they get semi-monthly billing  
9 if they paid in full at the beginning?

10 A The clients would not necessarily get the  
11 billing. Billing is just the name that it was  
12 referred to. Implementation consultants would  
13 still track their hours --

14 Q To be credited?

15 A -- whether we were billing the client or  
16 not.

17 Q Just to be credited?

18 A For their utilization.

19 Q Okay. So this is sort of referring to  
20 your internal billing procedures rather than giving  
21 the customer a bill?

22 A Yes and no. Bills can be created because  
23 of this, they don't necessarily have to be.

24 Q If it's applicable?

25 A Correct.

1 Q Okay.

2 MR. HERRINGTON: Let's go off the record  
3 for just one second.

4 (Off the record.)

5 (Deposition Exhibit 10 marked.)

6 BY MR. HERRINGTON:

7 Q I've handed you a document marked  
8 Plaintiff's Exhibit 10. It says PTS 1/8/2019, at  
9 the top left corner, Turlock, California.

10 Can you tell me what this document is?

11 A This is provided from Jira of the task of  
12 XTNI-19909, which was the on-site agenda for power  
13 user training.

14 Q Okay. So this is one ticket number  
15 equivalent to what we saw in the Hendersonville  
16 bill list?

17 A Correct.

18 Q Why was this one ticket number selected  
19 for production?

20 MR. McKEEBY: You can answer, if you  
21 know.

22 A This matches the agenda that was provided  
23 as well to show that she created that agenda.

24 BY MR. HERRINGTON:

25 Q I see.



1                   **Has the agenda been produced?**

2           A       I believe so.

3                   MR. McKEEBY: Right hand or left hand?

4           A       Left hand.

5   BY MR. HERRINGTON:

6           Q       Oh, Agenda (indicating) is the last word.

7           A       Yes, sir.

8           Q       Sorry.

9                   Did Ms. Greene create agendas other than  
10   the Turlock one?

11          A       It would have been typical if she was  
12   going on-site for training.

13          Q       Now, was MyKeya Henderson project manager  
14   -- you may have addressed this earlier, but I can't  
15   recall. Was she a project manager since back in  
16   2016?

17          A       I do not believe so.

18          Q       So she's been an implementation  
19   consultant previously?

20          A       Yes.

21                   MR. HERRINGTON: And next document marked  
22   Plaintiff's Exhibit 11.

23                   (Deposition Exhibit 11 marked.)

24   BY MR. HERRINGTON:

25          Q       Now, is this the Turlock, California

1 on-site agenda that's referenced on Exhibit 10 as  
2 an attachment?

3 A There are two documents listed. There's  
4 a PDF and a document.

5 Q Are they the same document but one in PDF  
6 form and one in Word?

7 A I believe so.

8 Q Why is the -- why is the Word document  
9 included in addition to a PDF?

10 A I believe it's just the PDF that's  
11 provided.

12 Q No, I mean, why was it attached? Why was  
13 the doc -- the Word file attached to begin with  
14 along with the PDF?

15 A I can't say.

16 Q Is it to allow the project manager to  
17 make changes?

18 A The implementation consultant would have  
19 made changes to it.

20 Q So this was -- ticket was not created by  
21 Ms. Greene?

22 A It was. She was assigned it.

23 Q It was created by Ms. Henderson and  
24 assigned to Ms. Greene?

25 A MyKeya reported it. Suzi was assigned to

1 it.

2 Q So what I'm getting at, is, who's the  
3 person who attached these when this was created?

4 A I can't tell from this. Referencing the  
5 later part of that --

6 Q Uh-huh.

7 A -- Suzi does say "Attached is my on-site  
8 agenda." So my assumption would be it was Suzi.

9 Q Okay. The agenda -- is there a template  
10 for agendas that implementation consultants can  
11 refer to to, again, for lack of a better word,  
12 because I don't know your industry well, from which  
13 they can cut and paste these different things that  
14 occur during the training?

15 Different -- you know, different things  
16 in the agenda, different prework tasks, the  
17 different things that are meeting room setup and  
18 resources.

19 Is there, you know, a template file that  
20 you would go to that might have a complete list of  
21 options and you would select the ones that are  
22 appropriate?

23 A Typically there would be a guide for them  
24 to refer to, but they would need to use their  
25 expertise to say I suggest a workshop here because

1     you do job costing. If there was a job costing,  
2     they would not suggest that. How much time needed  
3     to be allotted to each would depend upon their  
4     familiarity with the client as well.

5           **Q     What kind of factors would affect the**  
6     **amount of time needed?**

7           A     Example would be review and test over  
8     time. How many overtime policies does that client  
9     have, how intricate are they, are they custom, are  
10    they different for each group.

11          **Q     Does it make a difference how many**  
12    **employees are being trained?**

13          A     It does.

14          **Q     So you might need more time if there's**  
15    **more employees to be trained?**

16          A     Correct.

17          **Q     The guide that they would refer to, I**  
18    **don't believe that's been produced. Is that**  
19    **something that you-all would be able to produce to**  
20    **us?**

21          A     I believe so.

22          **Q     Okay.**

23                   (Deposition Exhibit 12 marked.)

24    BY MR. HERRINGTON:

25          **Q     I now hand you a document marked as**

1     **Plaintiff's Exhibit 12.**

2                   **Can you identify the document for me?**

3           A     This is a Quick Start Guide for Turlock,  
4     California.

5           **Q     What's a Quick Start Guide?**

6           A     MyKeya and Suzi developed this to give a  
7     detailed interaction of what a client would need to  
8     pay attention to after they were transitioned to  
9     our support team.

10          **Q     Had Quick Start Guides ever been created**  
11     **before this one?**

12          A     Prior to the Turlock guide?

13          **Q     Uh-huh.**

14          A     It was a typical part of MyKeya and  
15     Suzi's process.

16          **Q     Okay. No other teams used them?**

17          A     Not typically.

18          **Q     Okay.**

19          A     This was a suggestion that they used.

20          **Q     Okay. And who drafted the first one?**

21          A     I can't say.

22          **Q     Can you tell me anything about Suzi's**  
23     **contribution to this versus MyKeya's?**

24          A     Specifically to this guide itself for  
25     Turlock?

1           **Q     Either/or. For Turlock or in general.**

2           A     For Turlock, she would have gone through  
3 and made sure that each one of these items in here  
4 fit the client she was working with. In this case  
5 Turlock.

6                     Making sure that if it was flat file or  
7 direct connection would be her responsibility.  
8 Selecting what fields need to be manually managed.  
9 Adding any specific instructions or details that  
10 she felt needed to be there so that the client that  
11 she had worked with could have reference to those.

12           **Q     Now, you keep saying she would have. Do**  
13 **we know that she did, in fact, do that in this**  
14 **case?**

15           A     She did.

16           **Q     Okay. And how do you know that?**

17           A     She supplied this document to the client.

18           **Q     And you know that she created it based on**  
19 **the fact that she supplied it to the client?**

20           A     I believe that we could produce a Jira  
21 ticket that would relate to her referencing her  
22 creation of this.

23           **Q     Can you produce the Jira ticket list for**  
24 **the entire Turlock project like we did for**  
25 **Hendersonville?**

1           A     I can try.

2           Q     And you said that she would have gone  
3     through to make sure everything in the Quick Start  
4     Guide was applicable for this specific client.

5                     Again, is there a template Quick Start  
6     Guide that she went to that, you know, contains all  
7     -- the entire buffet that she can select from?

8           A     I'm uncertain as I did not myself use  
9     this.

10          Q     Okay. But I mean, you did say that she  
11     would have gone to some sort of earlier version of  
12     this to make sure it was appropriate for Turlock,  
13     right? That everything in it was appropriate?

14          A     She would have indicated what was and  
15     wasn't and added any additional thing she felt that  
16     needed to be.

17          Q     Well, can we get the earlier version  
18     before Suzi touched it so we can tell a difference  
19     between what it looked like before Suzi worked on  
20     it and what it looked like after?

21          A     I can look for that.

22          Q     All right. Are you familiar with the  
23     webinar that was provided to us in discovery?

24                     We gave you a lot of videos of Suzi doing  
25     trainings, but there was one document that you

1 pointed us to or your attorneys pointed us to  
2 unwind. We had trouble downloading it and then we  
3 asked for the file itself of the video of a  
4 webinar. Are you familiar with it?

5 A No.

6 Q Okay.

7 A I don't believe so.

8 MR. McKEEBY: Okay. Yeah, no, no, I  
9 thought you said yes. That would surprise me.  
10 Sorry.

11 BY MR. HERRINGTON:

12 Q It's where that flow chart with all the  
13 arrows came from, one of the earlier exhibits.

14 A Okay.

15 Q It also had -- and we won't make this an  
16 exhibit yet. This was one of the slides. Are you  
17 familiar with that (indicating)?

18 A (Shaking head.)

19 Q No?

20 A No.

21 Q Okay. Let's look at this real quick.  
22 This is just one -- I'll represent to you that this  
23 is one part of the webinar that was provided to us.  
24 It's just a slide still from the video.

25 MR. McKEEBY: We're marking this? 13?



1 MR. HERRINGTON: And it's marked as 13.

2 (Deposition Exhibit 13 marked.)

3 BY MR. HERRINGTON:

4 Q Now, what I'm a little confused by of the  
5 webinar that was produced is, you know, it seemed  
6 like more of a sales webinar, you know, trying to  
7 convince customers to use Tyler products -- or  
8 ExecuTime products, and this was part of it. Do  
9 you recognize this kind of data about return on  
10 investment as something that falls within, you  
11 know, training that an implementation consultant  
12 performs?

13 MR. McKEEBY: Object to the question as  
14 outside the scope of the corporate representative  
15 notice.

16 MR. HERRINGTON: I asked her about job  
17 duties.

18 BY MR. HERRINGTON:

19 Q And I'm asking is, you know, presenting  
20 this kind of information within an implementation  
21 consultant's job duties?

22 MR. McKEEBY: Presenting this kind of  
23 information to a client?

24 MR. HERRINGTON: Uh-huh.

25 MR. McKEEBY: Okay. You can answer.

1           A       I'm not sure.

2       BY MR. HERRINGTON:

3           Q       Okay. It's just that, you know, after  
4       viewing the webinar and then viewing all of Suzi's  
5       other videos, I got the sense that it was something  
6       completely different than what she does and --

7                   MR. McKEEBY: I don't remember what the  
8       webinar we produced was in response to, frankly,  
9       Matt.

10                  MR. HERRINGTON: It was in formal  
11       discovery at the beginning. I wanted access --

12                  MR. McKEEBY: I know.

13                  MR. HERRINGTON: -- to a mockup of the  
14       system so I could play with it and see how it  
15       worked.

16                  MR. McKEEBY: Right, and we couldn't give  
17       you that.

18                  MR. HERRINGTON: So you couldn't give me  
19       that so you gave a webinar as a sort of a  
20       substitute --

21                  MS. DIAZ: Overview of the system.

22                  MR. HERRINGTON: Okay. So it was  
23       overview of how ExecuTime software works?

24                  MS. DIAZ: Uh-huh.

25                  MR. HERRINGTON: But the presentation in

1 the video was not intended to be an example of what  
2 Ms. Greene would do?

3 MR. McKEEBY: Correct.

4 MR. HERRINGTON: Then we can forget about  
5 Exhibit 13.

6 (Deposition Exhibit 14 marked.)

7 BY MR. HERRINGTON:

8 Q Next I would like you to look at the  
9 document marked Plaintiff's Exhibit 14 and tell me  
10 if you can identify it.

11 A Can you tell me what you mean by  
12 "identify it," please?

13 Q Tell me if you have seen it before and  
14 tell me what it is.

15 A I have seen it, but I was not in a  
16 management capability when this was sent.

17 Q Okay. Well, it's an email from Kathy  
18 Thomas to John Jenkins giving him a document  
19 attached as the second page of the exhibit  
20 discussing a raise that Ms. Greene was receiving,  
21 correct?

22 A That appears accurate.

23 Q So did any implementation consultants who  
24 were -- again, on the second page it references the  
25 Fair Labor Standard Acts Salary Threshold, and that

1 she's receiving an increase in her pay to bring her  
2 above the threshold for exempt employees. Was this  
3 done across the board for any implementation  
4 consultants earning less than \$47,476?

5 MR. McKEEBY: Object to the form of the  
6 question as beyond the scope of the corporate  
7 representative notice.

8 You can answer if you know.

9 A I do not know.

10 (Deposition Exhibit 15 marked.)

11 BY MR. HERRINGTON:

12 Q Okay. The next document, marked  
13 Plaintiff's Exhibit 15.

14 Please take a moment to look at that and  
15 tell me if you recognize that.

16 A Yes.

17 Q Tell me what it is.

18 A This is a Personal Action Form.

19 Q And what is that?

20 A It could be any number of things. In  
21 this particular instance, it's a Merit/Performance  
22 Evaluation Change.

23 Q Okay. So this is a raise that Ms. Greene  
24 received?

25 A Yes.

1 Q Okay. And it was effective on October  
2 22nd, 2018?

3 A Correct.

4 Q Okay. Who made the decision to increase  
5 her pay?

6 A It would have been a collaborative  
7 decision.

8 Q Between who?

9 A Myself, Jamie Burns and Kathy Thomas.

10 Q And who are Kathy Thomas and Jamie Burns?

11 A They are -- they were at the time the  
12 manager and department head over implementation.

13 Q Okay. Now, Ms. Greene had performance  
14 problems at a couple of points in her employment;  
15 is that correct?

16 A She did.

17 (Deposition Exhibit 16 marked.)

18 BY MR. HERRINGTON:

19 Q I'll hand you a document marked  
20 Plaintiff's Exhibit 16.

21 Now, who's Talia Harrison?

22 A Talia Harrison?

23 Q Talia.

24 A She is a project manager that works for  
25 ExecuTime.

1 Q Okay. And you were a project manager  
2 working with Ms. Greene as well?

3 A Correct.

4 Q So she was working with Talia Harrison  
5 prior to you?

6 A And after.

7 Q And after, okay.

8 But she only worked with one of you at a  
9 time?

10 A That was typical.

11 Q All right. And this was a document  
12 created by whom?

13 A I'm not sure who created this.

14 Q Who would typically create it?

15 A At the time since she was reporting to  
16 Talia --

17 Q Uh-huh.

18 A -- it would have been her supervisor.

19 Q So her project manager created it?

20 A I cannot say.

21 Q Now, does this relate to performance  
22 problems Ms. Greene was having?

23 A I don't believe so.

24 Q And so what was the purpose of this  
25 document then?

1           A       This is a 90-day goal form.

2           Q       So this is what she's supposed to  
3   accomplish in the first 90 days of her employment?

4           A       I believe it would be a high level  
5   overview of that, the goals of that.

6           Q       Okay.

7                   (Deposition Exhibit 17 marked.)

8   BY MR. HERRINGTON:

9           Q       And this is document 17.

10                   Okay. Now, this is -- I'll represent to  
11   you this is part of an email chain that I've  
12   exerted from the first line at the very top. I'm  
13   not interested in -- it's part of another email in  
14   the chain. I'm looking at the email that -- from  
15   you to Ms. Greene. Can you tell me about this?

16           A       This is an email I sent as a follow-up  
17   with a phone conversation where I delivered her  
18   performance improvement plan to her.

19           Q       Okay. So these bullet points represent  
20   the major areas of her performance that needed to  
21   be improved?

22           A       Yes, she would have successfully  
23   completed this period, hopefully, within 30  
24   calendar days of the 11th of September.

25           Q       Okay. We're going through some of the

1 documents we've produced today, so you have those.

2 MR. McKEEBY: Can I get a time estimate  
3 on how things are looking?

4 MR. HERRINGTON: I only have a few  
5 questions about these, but I do need to identify  
6 and authenticate them.

7 MR. McKEEBY: Does that mean you're done  
8 after that or...

9 MR. HERRINGTON: With her, pretty much.

10 MR. McKEEBY: Okay. So I'll wait for a  
11 break.

12 MR. HERRINGTON: I will have to take  
13 about five minutes to make sure I have everything.

14 MR. McKEEBY: Of course.

15 (Deposition Exhibit 18 marked.)

16 BY MR. HERRINGTON:

17 Q Okay. Now, you've been handed  
18 Plaintiff's Exhibit 18. There are two paper clips,  
19 but I understand them to be a single document based  
20 on how they were joined when they were produced  
21 this morning. I don't think I need to go through  
22 the details, but can you tell me what this document  
23 is?

24 A Combined, this is an email strand from  
25 Talia to Brian Bushong who is a PM for one of our



1 clients, including Suzi and Brian Ledbetter based  
2 on an implementation timeline change.

3 Q Okay. And I see highlighting here in the  
4 first sentence of the email. Do you see that?

5 A I do.

6 Q Is that in the original email?

7 A The highlighting?

8 Q Yes. When it was sent by Talia Harrison.  
9 Or was it --

10 A I'm not sure.

11 Q Or was it highlighted for production for  
12 us today to draw our attention to the first  
13 sentence?

14 A I'm not sure.

15 MR. McKEEBY: And Matt, just for the  
16 record, we produced this with the transmittal from  
17 me to Mr. Beale, local counsel to print.

18 MR. HERRINGTON: Sure.

19 MR. McKEEBY: When I produce this, I'll  
20 probably redact that part.

21 MR. HERRINGTON: That's fine. Off the  
22 record.

23 (Off the record.)

24 BY MR. HERRINGTON:

25 Q Now, this is modifications to a timeline,

1 correct?

2 A Correct.

3 Q That are described in the email?

4 It says in the first sentence that

5 "Suzi's advised that changes are needed." Do you  
6 know who actually made the changes that are in the  
7 email?

8 You know, is he conveying Suzi's changes  
9 or is she conveying -- is Talia conveying Suzi's  
10 changes or are these changes made by Suzi or by  
11 Talia?

12 A They could have collaborated together on  
13 making the actual changes.

14 Q But we don't know?

15 A But I do not know.

16 Q And then the last couple pages of this  
17 exhibit, it looks like it's the attachment to the  
18 email, the xlsx file. What is this document?

19 A This is an implementation project plan or  
20 a timeline.

21 Q So this is what a timeline looks like  
22 when it is created?

23 A Typically. It could have additions.

24 Q The format is --

25 A It is.

1 Q It's the format of a typical timeline?

2 A Yes, sir.

3 Q Okay. But the details may be different?

4 A Exactly.

5 (Deposition Exhibit 19 marked.)

6 BY MR. HERRINGTON:

7 Q Okay. Would you tell me what this  
8 document is?

9 A This is a printout of XTNI-26838 which  
10 was related to Turlock, California, and an employee  
11 import issue they had. An email correspondence  
12 from meetings.

13 Q And who selected this document for  
14 production?

15 MR. McKEEBY: Object to the form of the  
16 question.

17 You can answer.

18 A I produced it.

19 BY MR. HERRINGTON:

20 Q Okay.

21 MR. McKEEBY: To me, right?

22 THE WITNESS: Right.

23 BY MR. HERRINGTON:

24 Q This was not produced before this  
25 morning, and I'm just wondering why it was produced

1     **today?**

2           A     It was produced after I met with  
3     Mr. McKeeby.

4           Q     **Okay. And this is -- we've seen this**  
5     **type of document before. It's a ticket entry with**  
6     **description and comments following?**

7           A     Correct.  
8                     (Deposition Exhibit 20 marked.)

9     BY MR. HERRINGTON:

10          Q     **All right. Now, please take a moment to**  
11     **look at the document marked Plaintiff's 20.**

12                  MR. McKEEBY: This is one of the  
13     contracts?

14                  MR. HERRINGTON: Huh?

15                  MR. McKEEBY: These are the contracts?

16                  MR. HERRINGTON: This is in the stack of  
17     stuff you gave me today.

18          A     Okay.

19     BY MR. HERRINGTON:

20          Q     **And can you please describe this for me?**

21          A     This is a contract for Dearborn,  
22     Michigan.

23          Q     **Is this an older contract for ExecuTime?**

24          A     It has a proposal as well from SunGard  
25     Public Sector and a purchase order as well for

1 ExecuTime.

2 Q So SunGard Public Sector generated this  
3 document?

4 A Portions of it.

5 Q This is not the complete contract between  
6 ExecuTime and SunGard, is it?

7 A I'm unsure.

8 Q So ExecuTime did transfer their purchase  
9 orders to Tyler when it was acquired?

10 A I'm unsure.

11 Q What is SunGard Public Sector?

12 A They are another company in the software  
13 public sector.

14 Q Uh-huh.

15 So this is another -- a company that is  
16 -- what is the nature of this contract? This is  
17 not a public sector customer, a city or, I mean, a  
18 municipality, so what is this?

19 A What is the proposal?

20 Q No, I mean, this is another company that  
21 is licensing the use of ExecuTime software.

22 A The add-on quotes in addition to it would  
23 have included ExecuTime.

24 Q Is this a contract that would include the  
25 performance of implementation services by

1     **ExecuTime?**

2             A     Yes.

3             Q     Okay. Is SunGard Public Sector itself a  
4     public sector entity?

5             A     They are a software company.

6             Q     Okay. So they're going to provide  
7     services similar to that provided by ExecuTime  
8     using ExecuTime software?

9                     Let me back up.

10                    Is ExecuTime the sole licensor of  
11     ExecuTime software?

12             A     Yes.

13             Q     Okay. Does anyone -- for example,  
14     SunGard in turn licenses it out to third parties?

15             A     No.

16             Q     So I'm just confused about in the --  
17     what's being agreed to here.

18                    ExecuTime is for public sector employers  
19     to track their time, their employee time. This is  
20     not a public sector employer despite the fact that  
21     public sector is in their name. So what use do  
22     they have for ExecuTime?

23             A     This is who sold ExecuTime. SunGard is  
24     the Dearborn, Michigan client's payroll system.  
25     They hosted it at the time. That's why the

1 contract is underneath SunGard.

2 Q I see. All right.

3 (Deposition Exhibit 21 marked.)

4 BY MR. HERRINGTON:

5 Q And now, 21, would you please take a  
6 moment to look at that and identify it?

7 A This is a quote for time clocks.

8 Q And is this a quote that would be  
9 generated by an implementation consultant? The  
10 type of quote that would be generated by an  
11 implementation consultant?

12 A A sales rep would have likely quoted this  
13 for this particular client.

14 Q All right.

15 (Deposition Exhibit 22 marked.)

16 BY MR. HERRINGTON:

17 Q I have the same question for Exhibit 22.  
18 Can you identify the document?

19 A This is a software support agreement with  
20 the City of Dearborn.

21 Q Okay. This is from 2015, correct?

22 A It looks like that's when it was signed.

23 Q Okay.

24 (Deposition Exhibit 23 marked.)

25 BY MR. HERRINGTON:

1 Q And for No. 23, please tell me if you  
2 recognize that and can identify it.

3 A This is a license and service agreement  
4 for the City of Helotes.

5 Q Okay. And would an implementation  
6 consultant have any role in creating this document?

7 A Creating it, no.

8 Q Do you know when this date's from, this  
9 agreement?

10 A Page 11 states it was signed in June of  
11 2018.

12 Q Okay.

13 (Deposition Exhibit 24 marked.)

14 BY MR. HERRINGTON:

15 Q And now, Document 24, Plaintiff's Exhibit  
16 24.

17 A A license and service agreement for Cedar  
18 Parks, Texas.

19 Q And it's from 2017, again, on Page 11?

20 A 2018 it was signed.

21 Q What page are you on?

22 A Page 11.

23 Q Are we looking at the same document?

24 A I have Cedar Parks Aquatic Division.

25 Q Can I see yours? They are not the same.



1                   You have the date 3/5/18 and February 12,  
2    '18, on Page 11?

3           A       I do.

4           Q       Okay. Would you go back to 23 and tell  
5    me what it was.

6                   MR. HERRINGTON: You can go off the  
7    record.

8                   (Off the record.)

9    BY MR. HERRINGTON:

10          Q       I see.

11                  Okay. And that's signed on Page 11, Rick  
12    Schroder, Janet Joiner, June 25, 2018?

13          A       Janet Joiner did sign on June 25, 2018.

14          Q       Okay. Turning to Page 3, can you --

15                  MR. McKEEBY: What exhibit?

16                  MR. HERRINGTON: 23.

17                  MR. McKEEBY: 23.

18                  MR. HERRINGTON: Going -- yeah, sorry,  
19    we're back in time.

20                  MR. McKEEBY: That's all right.

21          A       Please repeat the page.

22    BY MR. HERRINGTON:

23          Q       Page 3. It says -- under Services, it  
24    says Our Industry Standard Implementation Plan. Do  
25    you see that?

1           A       I do see that.

2           Q       Does that phrase Industry Standard  
3   Implementation Plan refer to any document in  
4   particular?

5           A       I'm not sure of the exact document.

6           Q       All right. Going to the final page of  
7   this document, Page 24 of Exhibit 23. I see a  
8   section called Incident Escalation.

9           A       Yes.

10          Q       Okay. It describes four levels of  
11   personnel. Who are Frontline Representatives under  
12   Level 1?

13          A       This would be with the support team, not  
14   the implementation team.

15          Q       So incident escalation is not something  
16   that -- that implementation consultants do?

17          A       They would, but not in this context.  
18   This relates in the contract to the support call  
19   process, Exhibit C on Page 22.

20          Q       Do you know if these contracts reference  
21   implementation consultants directly or indirectly?  
22   Just as Level 1 referenced certain personnel but  
23   not by their job titles, that's what I mean by  
24   indirectly.

25                   MR. McKEEBY: This contract specifically?

1 MR. HERRINGTON: Yeah.

2 BY MR. HERRINGTON:

3 Q I mean, under the Support Team it lists  
4 different levels of, you know, responsibility. And  
5 I'm wondering, you know, is the work of  
6 implementation consultant specifically referenced  
7 anywhere?

8 A I do not see it in this contract  
9 specifically.

10 Q Oak Harbor, Washington, have we looked at  
11 that?

12 A I don't believe so.

13 (Deposition Exhibit 25 marked.)

14 BY MR. HERRINGTON:

15 Q And first question is the same, can you  
16 identify the document?

17 A This is a software as a service agreement  
18 for Oak Harbor, Washington.

19 Q What is the difference between a license  
20 and services agreement and a software and service  
21 agreement?

22 A Software as a service relates to Tyler  
23 SaaS meaning Tyler hosts the application.

24 Q Okay. And the license service agreement  
25 would be where it's installed on their hardware?

1 A Self-hosted.

2 Q Yes, self-hosted.

3 A Yes.

4 Q Okay. On the fourth page of Exhibit 25,  
5 you see Other Professional Services. Do you see  
6 that?

7 A Yes.

8 Q Okay. Under Section C, No. 1, it says:  
9 We will provide you various implementation-related  
10 services itemized in the investment summary and  
11 described in our Industry Standard Implementation  
12 Plan.

13 Correct?

14 A That's what it says.

15 Q Okay. So it does seem here that Industry  
16 Standard Implementation Plan is an actual document  
17 because it's referred to in that plan, correct?

18 A It does appear that way.

19 Q Okay. So is that something you can  
20 locate if it in fact does exist?

21 A I can look for it.

22 Q Okay. And the Investment Summary. You'd  
23 agree that that is at the end of the contract  
24 attached as Exhibit A?

25 A Yes.

1           Q     Now, that summary -- this is what  
2 describes the implementation services to be  
3 provided in the contract?

4                     MR. McKEEBY: The what, I'm sorry?

5 BY MR. HERRINGTON:

6           Q     So going back to the third page -- or the  
7 fourth page, Other Professional Services: We will  
8 provide you the various implementation-related  
9 services itemized in the Investment Summary.

10                    So the customer is purchasing the  
11 implementation-related services itemized in A, in  
12 Exhibit A?

13           A     What is itemized is the number of  
14 implementation hours and what modules they  
15 purchased.

16           Q     What is on -- on the next page, 2 of 4,  
17 in Exhibit A, it says Total -- under Summary Total  
18 SaaS, Total Tyler Software, Total Tyler Services,  
19 and Total third-party Hardware Software and  
20 Services.

21                    Do you see that summary?

22           A     I do.

23           Q     Okay. Can you go through those four  
24 categories and just, you know, delineate what's in  
25 each of those categories?

1           A       Total Tyler Services of 24,480 would be  
2     the implementation costs and the costs of a VPN  
3     device.

4           Q       A VPN is?

5           A       Virtual private network.

6           Q       Okay. And that's --

7           A       It's a piece of hardware.

8           Q       Okay. We have remote login on my -- for  
9     my firm and we have a VPN, but it's not an extra  
10    piece of hardware as far as I know. And I'm  
11    extremely technologically illiterate, but it's just  
12    something that I downloaded I thought.

13                   So it's different here? It's an actual  
14    thing I can hold?

15          A       It is a piece of hardware.

16          Q       Okay. That's the total SaaS, right, the  
17    VPN?

18          A       That is the Total Tyler Service.

19          Q       Total Tyler is the VPN?

20          A       Is the -- in combined with the  
21    implementation costs of 24,480.

22          Q       I see.

23                   So that includes implementation plus the  
24    hardware, correct?

25          A       Correct.

1 Q What portion of that is -- is the VPN  
2 hardware?

3 A \$4,000.

4 Q Okay. And Total SaaS, that is a  
5 recurring fee. Is that annual?

6 A It depends on the contract. In this  
7 particular instance referring back to the  
8 Investment Summary --

9 Q Uh-huh.

10 A -- it would be annual.

11 Q Okay. And that's for the software  
12 itself?

13 A That's for the licensing. The -- pardon  
14 me. That's for software as a service. That's for  
15 us hosting it.

16 Q Okay. So it's a -- so if you weren't  
17 hosting it, the license, the annual license for it  
18 would be cheaper?

19 A Not necessarily.

20 Q No.

21 A It would depend upon the contract and  
22 what was agreed upon.

23 Q So it's not generally -- using a year of  
24 ExecuTime when you self-host does not result in  
25 paying less money to ExecuTime than having the same

1     **service hosted by Tyler?**

2           A     For clarification --

3           Q     **Uh-huh.**

4           A     -- paying to ExecuTime, yes. For the  
5     client if they have to host it themselves --

6           Q     **Yes.**

7           A     -- it could be a wash.

8           Q     **They take on that cost themselves  
9     whatever it may be?**

10          A     Whatever it may be.

11          Q     **Okay. What is Total Tyler Software? Is  
12     that just ExecuTime self-hosted?**

13          A     I'm not sure.

14          Q     **Okay. Third-party Hardware Software and  
15     Services, do you know what that is?**

16          A     May I refer to a previous document?

17          Q     **Sure.**

18          A     Contract.

19          Q     **Just let us know what you're referring to  
20     if you find what you're looking for.**

21          A     Referring to Cedar Park License and  
22     Service Agreement, Exhibit 24, third-party  
23     hardware/software services are time clocks as well  
24     as biometric readers.

25          Q     **Okay. So that's another thing they could**



1 purchase in addition to time clocks?

2 A Biometric readers?

3 Q Uh-huh.

4 A Yes, sir.

5 Q Okay. Anything else that -- you know,  
6 that we should add to the list of things, of  
7 hardware they can purchase, aside from time clocks  
8 and biometrics?

9 A Proximity readers.

10 Q That's not involved in ExecuTime, though,  
11 right?

12 A Proximity readers?

13 Q Uh-huh.

14 A It would be a way to log into the time  
15 clock.

16 Q Oh, okay. I understood that differently,  
17 but okay.

18 Anything else that they could purchase as  
19 an add-on?

20 A Not that I recall off the top of my head.

21 Q Okay. Do the implementation consultants  
22 have anything to do with the implementation of  
23 biometric scanners or proximity readers?

24 A Yes.

25 Q Okay. Did Ms. Greene specifically?

1 A Likely.

2 Q Likely, okay.

3 Can you give me a ballpark percentage of  
4 customers who use biometrics or proximity readers?

5 A It would depend upon if they had time  
6 clocks and if their contract had them or they  
7 wanted to use those, so...

8 Q Are time clocks more common than  
9 biometrics or proximity readers?

10 A Time clocks are needed to add on  
11 biometrics and proximity.

12 Q I see.

13 So by definition they are more common?

14 A Than those two, yes.

15 MR. McKEEBY: Let's take a break.

16 MR. HERRINGTON: Okay.

17 (Recess taken.)

18 (Deposition Exhibit 26, Exhibit 27,  
19 Exhibit 28 were marked.)

20 BY MR. HERRINGTON:

21 Q Ms. Pasch, would you take a moment to  
22 look at Exhibit No. 26 and tell me if you recognize  
23 it.

24 A Yes.

25 Q And what is this document?

1           A       This is the agreement between Turlock and  
2       Tyler for Standard Software License Services.

3           Q       So they entered into a contract at the  
4       outset that at some point it needed to be changed?

5           A       Yes, it appears so.

6           Q       Okay. Do you know how that change came  
7       about?

8           A       I do not recall.

9           Q       So is it -- I mean, is it the company's  
10       contention that Ms. Greene had something to do with  
11       this change or is this just an example of what an  
12       amendment looks like?

13          A       This is an example.

14          Q       Okay. Would you look now at Exhibit 27.  
15       I believe this is another amendment.

16          A       This is.

17          Q       Okay. And it's for?

18          A       Moorpark.

19          Q       Okay. And is this just another example?

20          A       It is.

21          Q       Okay. So no direct connection with  
22       Ms. Greene?

23          A       Other than she was the implementation  
24       consultant on this.

25          Q       Okay. I'm just wondering because you

1 said that they couldn't make recommendations. And  
2 I'm just going through these to make sure that  
3 there's not a story attached to it that I need to  
4 know about about changes that Ms. Greene  
5 specifically suggested, right?

6 A Right.

7 Q And the next one 28, same questions?

8 A Correct, an example.

9 Q Great.

10 MR. HERRINGTON: Let's go off the record.

11 (Off the record.)

12 (Deposition Exhibit 29 marked.)

13 BY MR. HERRINGTON:

14 Q And please look at Exhibit 29, and same  
15 questions, identify it, and tell me if this is  
16 connected to Ms. Greene directly or just an example  
17 of an amendment?

18 A It's an example of an amendment for  
19 Moorpark.

20 Q Uh-huh.

21 A But it has an investment summary tied to  
22 it.

23 Q Okay. And tell me about the investment  
24 summary. First of all, what is an investment  
25 summary?

1           A     It's a list of Tyler software and related  
2     services.

3           Q     **Okay. So an invoice?**

4           A     What's included in what they purchased or  
5     would be optional. In this instance it has  
6     implementation hours, licensing fees, and a time  
7     clock.

8           Q     **So they would get this -- we don't know**  
9     **at what stage during the implementation that this**  
10    **would have -- amendment would have been entered**  
11    **into, do we?**

12          A     I do not.

13          Q     **And finally, Exhibit 30.**

14                (Deposition Exhibit 30 marked.)

15    BY MR. HERRINGTON:

16          Q     **Can you identify that for me?**

17          A     This is an example of an investment  
18     summary for the City of Oak Harbor.

19          Q     **Thank you.**

20                **I just need to check and see what else I**  
21    **have if anything.**

22                MR. McKEEBY: Do you want us to leave?

23                MR. HERRINGTON: You can leave if you  
24     need to. It may take me a few minutes.

25                MR. McKEEBY: Off the record.

1 MR. HERRINGTON: Uh-huh.

2 (Off the record.)

3 BY MR. HERRINGTON:

4 Q So some sort of scattered questions now  
5 that I'm cleaning up things.

6 In the conversion process, can you just  
7 sort of define what you understand conversion  
8 process to mean?

9 A I would relate that to integration  
10 process.

11 Q Okay. And how are technical problems in  
12 the integration process identified?

13 A It would depend upon the type of problem.  
14 An example I can give is employees aren't  
15 terminating when they're coming from the payroll  
16 into ExecuTime. You don't want terminated  
17 employees in and so that is a basis of a problem.

18 Q How would you find out that that's  
19 happening?

20 A Either you noticed it yourself as an  
21 implementation consultant when you were preparing  
22 for the integration review call or the client  
23 brought it to your attention.

24 Q Okay. Are there other common problems  
25 that pop up during conversion?

1 A Not commonly. It depends upon the type.

2 Q I don't mean the problems occur commonly.  
3 But if a problem occurs, are there usual suspects  
4 for things that -- you know, if there is a problem,  
5 you would expect it to be X, Y, or Z?

6 A Strictly related to integration it  
7 depends. It changes daily based on what it would  
8 be, but there would be a list of things to try.

9 If it were common problems, the only  
10 common problems I could refer to would be benefits  
11 aren't updating, employees aren't updating.  
12 Anything to have to do with the integration would  
13 be the only commonality.

14 Q Okay. How often do project managers  
15 communicate with implementation consultants?

16 A The goal would be daily.

17 Q What would the minimum be?

18 A Three to four times a week. Three times  
19 a week.

20 Q Who determines whether a project is ready  
21 to go live?

22 A It would be the job of an implementation  
23 consultant to make that final determination. There  
24 could be collaboration and thought processes with  
25 the project manager, but determining that would be

1 the implementation consultant and the client.

2 Q Okay. So they don't have to go through  
3 the project manager to do that?

4 A To determine if they're ready to go live?

5 Q Yes.

6 A No.

7 Q So it can go live just on the  
8 implementation consultant's say-so?

9 A Yes.

10 Q Did that ever happen with Ms. Greene?

11 A It would often happen. That's part of  
12 their job as an implementation consultant would be  
13 to make sure that it meets the deadlines and the  
14 timelines and do their daily tasks around that  
15 premise.

16 Q When implementation consultants assess  
17 client needs, client satisfaction -- let's say  
18 client satisfaction, is that recorded anywhere?

19 A Is their satisfaction reported anywhere?

20 Q Yes. Does the implementation consultant  
21 have a standard way of tracking client  
22 satisfaction?

23 A I believe it would depend upon the  
24 implementation consultant. They had their own  
25 varying ways of tracking that.



1           **Q     Can you give examples?**

2           A     There is a process that needs to occur  
3     prior to the transition to support and that is the  
4     pass to support process. Part of that is  
5     determining whether or not they're ready to  
6     transition.

7                     And part of that would hopefully be that  
8     they're happy and referenceable as well. So that  
9     could be kept in the pass to support template that  
10    they would fill out. It's referred to as client  
11    mood.

12                    MR. HERRINGTON: Okay. I don't believe  
13    that's been provided to us, the pass to support  
14    template.

15    BY MR. HERRINGTON:

16           **Q     Are you aware of any instances in which**  
17    **Ms. Greene has been dishonest, specific instances?**

18           A     I would not use the term "dishonest." I  
19    would refer to exaggerations. My specific instance  
20    for that would be the time sheets where she would  
21    have roughly 40 hours a week, and she's exaggerated  
22    to the point in my belief that she worked an  
23    exuberant amount of hours beyond that.

24           **Q     Okay. So other than the amount of hours**  
25    **that she worked, you don't think -- there's no**

1 other instances of dishonesty or exaggeration  
2 you're aware of?

3 A Not that I recall.

4 Q Okay. And the time sheets often totaled  
5 up to 40 hours, correct, her time sheets?

6 A At a certain point when we were utilizing  
7 that degree of tracking, they were required to  
8 enter up to 40 and actually report on what they  
9 did. So the minimum was 40. Whether it involved  
10 PTO, administrative time, that was the minimum.  
11 But they were advised to actually produce what they  
12 did work.

13 Q Did anyone ever raise an issue with the  
14 fact that it said 40 -- you know, once an employee  
15 has reported hitting 40 hours exactly a few times,  
16 did that raise eyebrows as being perhaps not  
17 accurate?

18 A I'm not a micro manager and we really  
19 don't do it off of basis of hours per week.

20 Q Uh-huh.

21 A It's more of work accomplished. So  
22 eyebrows raised versus meeting goals would be my  
23 difference.

24 Q Okay. Yeah, because I did see, you know,  
25 problems that arose with her timely recording her

1 billable hours, but I didn't see complaints about  
2 -- I think there were deadlines that weren't met as  
3 well other than billable hour entries.

4 But I'm -- I'm losing my train of thought  
5 is what I'm doing.

6 Before an implementation consultant gives  
7 the go head to go live, does it have to be approved  
8 by the customer?

9 A Yes.

10 MR. HERRINGTON: Okay. I think that's  
11 it.

12 (Off the record.)

13 BY MR. HERRINGTON:

14 Q Yeah, so, again, Topic No. 10 for the  
15 deposition today was assessing client needs and  
16 client satisfaction specific instances of that. So  
17 I just want to revisit that one more time.

18 Specific instances in which Ms. Greene,  
19 you know, did that, you know, that you can point  
20 to, you know, with a real client rather than it's  
21 just a general concept of expectations.

22 A I would refer back to Turlock. Mostly  
23 because that was definitely a client that was  
24 recent. She would have been involved in the pass  
25 to support process. The mood would have been

1     ascertained at that time. And I would have been  
2     able to follow up on that with a reference call  
3     that a manager of implementation would make.

4           **Q     But you don't have specific recollection**  
5     **of any of that? You're saying what we would expect**  
6     **to have happened.**

7           **A     I recollect that that happened with**  
8     **Turlock.**

9           **Q     Okay. Tell me specifically what**  
10    **Ms. Greene did. You know, what did she tell you**  
11    **that the client needed that had to be acted on?**

12          **A     It would have been satisfaction for that**  
13    **example.**

14          **Q     Again, you're saying "would have been."**  
15    **I want to know what she said. I want a specific**  
16    **example like in the topic.**

17                   MR. McKEEBY: She's giving you a specific  
18    example. She just can't remember verbatim what she  
19    said. That's a different question.

20    BY MR. HERRINGTON:

21          **Q     Okay, elaborate.**

22          **A     I can't repeat what was said verbatim**  
23    **word by word from Suzi to me related to that**  
24    **client.**

25          **Q     What was the gist of it?**

1           A     The gist of it was this client is ready  
2     to transition to support. I would have asked what  
3     would you rate their mood to be or she would have  
4     filled out that pass to support template to say  
5     their mood is great, and then I would have followed  
6     up with a reference call, which is standard. I  
7     would do that on each and every client if I had the  
8     ability.

9           Q     Do you ask the customers about their  
10    satisfaction when you speak to them?

11          A     I do.

12          Q     Okay. Are there any documents that would  
13    memorialize Ms. Greene actually conveying that  
14    information to you?

15          A     I would have to verify, but the pass to  
16    support document likely would have had mood on it.

17          Q     All right. So if that exists, you can  
18    produce that to us?

19          A     If it exists.

20          Q     When the company was having  
21    implementation consultants report their nonbillable  
22    time, what was done with those numbers, you know,  
23    that data?

24          A     It's kept in -- it should be kept in PSA,  
25    which is the reporting software. Analytics were

1 not done on them to my -- the best of my ability.

2 MR. HERRINGTON: All right. That's it.

3 Thank you.

4 THE WITNESS: Thank you.

5 MR. McKEEBY: We'll reserve our  
6 questions.

7 Off the record.

8 (Deposition concluded at 4:12 p.m.)

9 (Signature reserved.)

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1 C E R T I F I C A T E

2 STATE OF GEORGIA:

3 COUNTY OF DEKALB:

4

5 I hereby certify that the  
6 foregoing transcript was taken down, as  
7 stated in the caption, and the questions  
8 and answers thereto were reduced to  
9 typewriting under my direction; that the  
10 foregoing Pages 1 through 190 represent a  
11 true and correct transcript of the  
12 evidence given upon said hearing, and I  
13 further certify that I am not of kin or  
14 counsel to the parties in the case; am not  
15 in the regular employ of counsel for any  
16 of said parties; nor am I in anywise  
17 interested in the result of said case.  
18 The witness did reserve the right  
19 to read and sign the transcript.

20 This, the 25th day of October 2019.

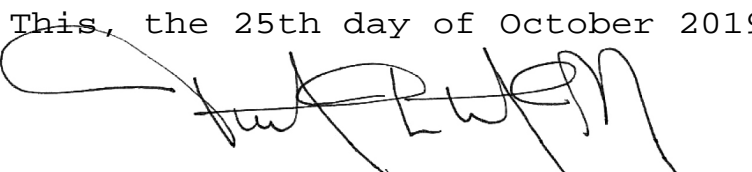
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25 Job No. 538

  
Judith L. Leitz Moran, CCR-B-2312  
Certified Court Reporter

## 1 DISCLOSURE

2  
3 Pursuant to Article 10.B of the Rules and  
4 Regulations of the Board of Court Reporting of the  
5 Judicial Council of Georgia, I make the following  
6 disclosure:

7 I am a Georgia Certified Court Reporter. I am  
8 here as a representative of IST Reporting.

9 I am not disqualified for a relationship of  
10 interest under the provisions of O.C.G.A.  
11 9-11-28(c).

12 I was contacted by the office of IST Reporting  
13 to provide court reporting services for this  
14 deposition.

15 I will not be taking this deposition under any  
16 contract that is prohibited by O.C.G.A. Section  
17 15-14-37 (a) and (b).

18 I have no exclusive contract to provide  
19 reporting services with any party to the case, any  
20 counsel in the case, or any reporter or reporting  
21 agency from whom a referral might have been made to  
22 cover this deposition.

23 I will charge my usual and customary rates to  
24 all parties in the case, and a financial discount  
25 will not be given to any party to this litigation.

26 This, the 25th day of October 2019.

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Judith L. Leitz Moran, CCR-B-2312  
Certified Court Reporter

Job No. 538



## 1 DISCLOSURE OF FIRM

2

3 I, IST Reporting, do hereby disclose pursuant  
4 to Article 10.B. of the Rules and Regulations of  
5 the Board of Court Reporting of the Judicial  
6 Council of Georgia that IST Reporting was contacted  
7 by DELONG, CALDWELL, BRIDGERS, FITZPATRICK &  
8 BENJAMIN, LLC, to provide court reporting services  
9 for this deposition and there is no contract that  
10 is prohibited by O.C.G.A. 15-14-37(a) and (b) or  
11 Article 7.C. of the Rules and Regulations of the  
12 Board for the taking of this deposition.

13

14 There is no contract to provide reporting  
15 services between IST Reporting or any person with  
16 whom IST Reporting has a principal and agency  
17 relationship nor any attorney at law in this  
18 action, party to this action, party having a  
19 financial interest in this action, or agent for an  
20 attorney at law in this action, party to this  
21 action, or party having a financial interest in  
22 this action. Any and all financial arrangements  
23 beyond our usual and customary rates have been  
24 disclosed and offered to all parties.

25

26 This, the 25th day of October 2019.

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36 Job No. 538



37  
38 FIRM REPRESENTATIVE  
39 IST REPORTING

## 1 ERRATA PAGE

2 Pursuant to Rule 30(e) of the Federal  
 3 Rules of Civil Procedure and/or Georgia Code  
 4 Annotated 9-11-30(e), any changes in form or  
 5 substance which you desire to make to your  
 6 deposition testimony shall be entered upon the  
 7 deposition with a statement of the reasons given  
 8 for making them. To assist you in making any such  
 9 corrections, please use the form below. If  
 10 supplemental or additional pages are necessary,  
 11 please finish same and attach them to this errata  
 12 sheet.

13 I, the undersigned, HILLARY PASCH, hereby  
 14 certify that I have read or have had read to me the  
 15 foregoing, and that to the best of my knowledge  
 16 said is true and accurate with the exception of the  
 17 following corrections.

11

12 Page/Line/ Change / Reason

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20	Sworn to and subscribed before me			
21	this ____ day of _____, 20__.			
22	_____ Notary Public.			
23	My Commission Expires _____.			
24				
25	Job No. 538			

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